Final ENVIRONMENTAL ASSESSMENT

Demolition of the Walson Hospital Complex at Joint Base McGuire-Dix-Lakehurst, New Jersey



June 2012

Prepared by: EHS Technologies, Moorestown, NJ

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Finding of No Significant Impact (FONSI)

Environmental Assessment (EA)

Demolition of Walson Hospital Complex at Joint Base McGuire-Dix-Lakehurst (JB MDL), New Jersey

Purpose

The purpose of the Proposed Action is to reduce the infrastructure utility and maintenance costs at JB MDL.

The U.S. Air Force has prepared this EA in accordance with the National Environmental Policy Act (NEPA); the Council on Environmental Quality (CEQ) regulations implementing NEPA; and the Title 32, Code of Federal Regulations, Part 989, as amended, The Environmental Analysis Process (EIAP). The EA is attached to this Finding of No Significant Impact.

Proposed Action

The Proposed Action would demolish the Walson Hospital Complex, Buildings 5250 (Hospital), 5251 (refrigeration and air conditioning plant), and 5252 (heat plant) on the Dix area, in Burlington County, NJ.

Description of the Alternatives

Alternative 1 - Demolish Walson Hospital Complex (Preferred Alternative).

The former Walson Army Hospital complex occupies approximately 26 acres within the Dix cantonment area. The project would demolish the main hospital building (5250), the refrigeration and air conditioning plant (5251), and the heat plant (5252) (Figure 2-2). The hospital ranges from one story to eleven stories in height (totaling 384,057 square feet). Buildings 5251 and 5252 are 2,170 and 5,693 square feet, respectively. The project would also demolish and remove associated parking lots, curbing, and walkways. The work would include the removal of demolition debris, removal of the concrete foundation and slab, hauling, disposal, excavation and backfill, and removal and termination or capping of utility services. The demolition process would be decided by the construction contractor and could include blasting or whole-building implosion (after appropriate asbestos abatement is completed and approval of a written blasting procedure).

Construction debris (concrete, asphalt, metal and wood) would be recycled to the extent practicable. The site would be restored to a more natural condition, with the application of topsoil and grass seed.

Two truck access options were analyzed under Alternative 1. Under Option 1, truck traffic would utilize the existing commercial gate (Checkpoint 9) on the Dix area off of Saylors Pond Road. Under Option 2 (preferred option), the contractor would create a temporary fenced access road from Fort Dix Road, along 4th Street and across a field to the Walson Complex as their primary means of access.

No Action Alternative

Under this alternative, JB MDL would retain the buildings in their current deteriorated, unoccupied states, with all utilities (e.g., electricity and heating, ventilation, and air conditioning

systems) remaining off, and no renovations or repairs undertaken until a beneficial re-use could be found.

Summary of Anticipated Environmental Impacts Associated with the Proposed Action

Based on the analysis in the EA, which is herewith incorporated by reference, I determine that no significant adverse effects are expected on any resource area as a result of the implementation of the Proposed Action. We would adhere to all installation management plans, policies and procedures. Furthermore, the project would adhere to several Construction Best Management Practices to minimize environmental and safety impacts. The Proposed Action would result in less than significant impacts to land use, air quality, soils, water resources, biological resources, cultural resources, infrastructure, materials and wastes, safety, and transportation and traffic. There would be short-term positive impacts on socioeconomics in the form of short-term jobs. There would be long-term positive impacts on stormwater runoff at the site. Overall, the analysis in the EA indicates that the Proposed Action would not result in or contribute to significant adverse direct, indirect, or cumulative impacts to the resources in the region.

Public Review and Interagency and Intergovernmental Coordination Planning

The Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) process associated with the preparation of the EA was conducted for 30 days, beginning March 16, 2012. The public and agency review of the Draft EA and Draft FONSI was conducted between May 11, 2012 and June 12, 2012. Copies of these documents were available for public review at the Manchester Library, Ocean County and the Pemberton Library, Burlington County. All public comments received were addressed in the Final EA.

Finding of No Significant Impact

The Air Force, JB MDL has determined that the Preferred Alternative is Alternative 1 with truck access Option 2 and that the JB MDL would proceed with demolition of the Walson Hospital Complex.

I conclude that the environmental effects of the Proposed Action at JB MDL are not significant, that preparation of an Environmental Impact Statement is unnecessary, and that a FONSI is appropriate. The EA, prepared in accordance with NEPA, CEQ regulations, and 32 Code of Federal Regulations 989 as amended, is herein incorporated by reference.

JOHN M WOOD, Colonel, USAF

Commander, Joint Base McGuire-Dix-Lakehurst

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Date

Attachment: Environmental Assessment

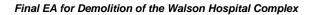
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List of Acronyms

AFI	Air Force Instruction	NJ	New Jersey
APE	Area of Potential Effect	N.J.A.C.	New Jersey Administrative Code
BMPs	Best Management Practices	NJDEP	New Jersey Department of Environmental Protection
CAA	Clean Air Act		
CEQ	Council on Environmental Quality	NJPDES	New Jersey Pollution Discharge Elimination System
CFR	Code of Federal Regulations	NJSA	New Jersey Statutes Annotated
СО	Carbon monoxide	NOA	Notice of Availability
CR	County Route	NOx	Nitrogen oxides
CRM	Cultural Resources Manager	NRHP	National Register of Historic Places
DoD	Department of Defense	00114	Occupational Safety and Health
EA	Environmental Assessment	OSHA	Administration
EBS	Environmental Baseline Survey	PCB	Polychlorinated biphenyl
EIS	Environmental Impact Statement	PM	Particulate matter
EO	Executive Order	RACM	Regulated Asbestos-Containing
ESA	Endangered Species Act		Material
FONSI	Finding of No Significant Impact	RONA	Record of Non-Applicability
FY	Fiscal Year	sf	Square feet
GIS	Geographic Information System	SHPO	State Historic Preservation Office
GSF	Gross square feet	SIP	State Implementation Plan
HAZMART	Hazardous Material Control Program	SO ₂	Sulfur dioxide
ICDMD	Integrated Cultural Resources	tpy	Tons per year
ICRMP	Management Plan	USEPA	United States Environmental Protection Agency
INRMP	Integrated Natural Resources Management Plan	USC	United States Code
JB MDL	Joint Base McGuire-Dix-Lakehurst	UST	Underground storage tank
NAAQS	National Ambient Air Quality	VOC	Volatile Organic Compound
INAAQO	Standards	μg/m3	Microgram/cubic meter
NEPA	National Environmental Policy Act		
NFPA	National Fire Protection Association		



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1. PURPOSE AND NEED FOR THE PROPOSED ACTION

1.1 Introduction

Joint Base McGuire-Dix-Lakehurst (JB MDL) (Figure 1-1) proposes to demolish the Walson Hospital Complex, Buildings 5250 (Hospital), 5251 (refrigeration and air conditioning plant), and 5252 (heat plant) on the Dix area, in Burlington County, NJ. This Environmental Assessment addresses the potential environmental, socioeconomic, and cultural impacts of this proposal at JB MDL.

This Environmental Assessment (EA) has been prepared to document the potential environmental impacts resulting from demolition of the complex. This EA has been prepared under the provisions of, and in accordance with, the National Environmental Policy Act (NEPA) of 1969 (42 United States Code [USC] 4321 et seq.), Council Quality [CEQ] Environmental Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and 32 CFR 989 (Air Force Environmental Impacts Analysis Process).

1.2 Purpose and Need

The Proposed Action is needed to reduce the infrastructure utility and maintenance costs at JB MDL.

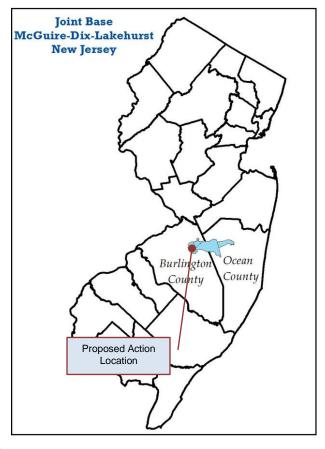


Figure 1-1. Location of JB MDL

The Air Force is pursuing several strategies to reduce the portion of the budget used for installation support that would free resources to support the Warfighter and recapitalize Air Force weapons systems. The Proposed Action would help meet the Air Force strategic goal to reduce facilities and infrastructure costs by 20 percent by the year 2020 (AF, 2008).

1.3 Scope and Content of the Environmental Assessment

This Environmental Assessment evaluates the individual and cumulative effects of the alternatives with respect to land use, air quality, soils, water resources, biological resources, cultural resources, socioeconomics, infrastructure, materials/waste, and human health and safety.

1.4 Decisions to be Made

JB MDL will decide on the whether to demolish the Walson Hospital Complex (Proposed Action), or continue to leave the buildings "as is" for potential future reuse (No Action Alternative). JB MDL will also decide on a truck route option for hauling demolition debris and fill dirt if the Proposed Action is selected.

1.5 Interagency Coordination and Public Involvement

Public participation is a significant component of the NEPA process. The following provides a listing of key public notification and participation events that have and will occur as part of this environmental review process:

- JB MDL conducted intergovernmental coordination for environmental planning pursuant to the requirements of NEPA as required under Executive Order (EO) 12372, which has since been superseded by EO 12416 *Intergovernmental Review of Federal Programs*, and subsequently supplemented by EO 13132. The EA provides a list of agencies contacted during initial scoping (Chapter 9). Copies of the letters received from the respective agencies are included in **Appendix A**.
- The project sites are located in previously disturbed areas that are unlikely to contain archeological sites; however, if sites are discovered, JB MDL would cease all disturbance activity, secure the site(s) and contact the JB MDL Cultural Resources Manager (CRM). The CRM will take necessary actions pursuant to the JB MDL Integrated Cultural Resources Management Plan (ICRMP).
- JB MDL published and distributed the Draft EA and Draft Finding of No Significant Impact (FONSI) for a 30-day public comment period between May 11, 2012 and June 12, 2012. The mailing list for the Draft EA is provided in Chapter 10. Notification of the availability of the Draft EA and FONSI has been accomplished through publication of a legal Notice of Availability (NOA) in the Burlington County Times, the local newspaper that services the JB MDL region. Upon distribution of the Draft EA to the public, copies of the Draft EA and important reference documents were made available for public review at the Pemberton Branch of the Burlington County Library. The JB MDL Public Affairs Officer is the primary point of contact for any inquiries from the local news media.
- JB MDL received responses and/or comment letters from all interested parties in association with the public circulation of the Draft EA. Copies of received responses/comments on the Draft EA, as well as responses to these comments, are provided in **Appendix E**.

2. DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES

2.1 Proposed Action

JB MDL proposes to demolish the Walson Hospital Complex (Buildings 5250, 5251, and 5252) on the Dix area in Burlington County (Figure 2-1).



Walson Army Hospital, Fort Dix, N.J.

Figure 2-1. Walson Hospital, 1960.

2.2 Alternatives

This EA evaluates the individual and cumulative effects of the following alternatives with respect to land use, air quality, topography and soils, water resources, biological resources, cultural resources, socioeconomics, infrastructure, materials and waste, and human health and safety.

2.2.1 Alternative 1 – Demolish Walson Hospital Complex (Preferred Alternative)

The project would demolish the main hospital building (5250), the refrigeration and air conditioning plant (5251), and the heat plant (5252) (Figure 2-2). The project would also demolish and remove associated parking lots, curbing, and walkways. The work would include the removal of demolition debris, removal of the concrete foundation and slab, hauling, disposal, excavation and backfill, and removal and termination or capping of utility services. The demolition process would be decided by the construction contractor and could include blasting or whole-building implosion (after appropriate asbestos abatement is completed and approval of a written blasting procedure).

Construction debris (concrete, asphalt, metal and wood) would be recycled to the extent practicable. The site would be restored to a more natural condition, with the application of topsoil and grass seed. The estimated demolition cost is \$32 million and the project would last approximately 18 months.

2.2.1.1 Construction Vehicle Access Options

Due to the high volume of truck traffic anticipated under Alternative 1, the Air Force is considering two options under this alternative for construction vehicle access.

- Option 1: Utilize the existing commercial gate (Checkpoint 9) on the Dix area off of Saylors Pond Road.
- Option 2 (Preferred Option). Create temporary fenced access from Fort Dix Road, along 4th Street and across a field to the complex. This option would provide a means to fence off the site from the rest of the installation during the demolition contract, allowing trucks to access the site more quickly than under Option 1. Trucks would enter at Fort Dix Road, with a new parallel gravel access road just outside the traffic circle. The path would then follow and close-off 4th street for about 1000 feet. The path would then turn south along a tree line for about 400 feet and then turn east along a grassy field for about 750 feet, where it would then cross New Jersey Avenue to the complex (Figure 2-2). The overall length of the temporary access road would be 0.63 miles (3,310 feet). All the fencing and gravel would be removed at the end of the project.

2.2.1.2 History of the Complex

The former Walson Army Hospital complex occupies approximately 26 acres within the Dix cantonment area. The site is located approximately 20 miles southeast of Trenton, New Jersey. The site is bounded by Maryland Avenue (east), North Scott Plaza (north), New Jersey Avenue (west), and Walson Avenue (south). The former 500-bed hospital, with central-core medical facilities, was dedicated at Fort Dix, on March 15, 1960, by Secretary of the Army Wilber M. Brucker (Figure 2-1). This hospital was named in memory of the late Brigadier General Charles Moore Walson, a distinguished medical officer who died on May 14, 1959, and who was surgeon of the First U.S. Army before his retirement in 1947.

The hospital ranges from one story to eleven stories in height (totaling 384,057 square feet). Two main nine-story wings are attached at right angles to a central 11-story elevator wing, with additional one to four-story wings, annexes, and attached facilities radiating out from the central core and main wings. Originally constructed with three wings, the hospital was expanded to five wings during the 1960's and 1970's. The Refrigeration and Air Conditioning Plant is approximately 2,170 square feet and contains two chiller units, an exterior cooling tower, and associated exterior and interior piping to support the hospital cooling system. The Boiler Plant is approximately 5,693 square feet. There are about 400 parking spaces associated with the complex.

Walson ceased operation as an Army Hospital in 1992. It was then permitted to the Air Force on 12 September 1992 until 1 August 2001 as a medical clinic. The facility was then vacant until October 2002 when the State Local Redevelopment Authority released its claim (a result of the 1995 Base Realignment and Closure process). Walson was temporarily used for mobilization between March and July 2003 and again from March 2004 to November 2006, and has been vacant since then. A description of the current condition of the building and findings of past and recent building surveys is provided in Section 3.9 "Infrastructure".

2.2.2 Alternative 2 – No Action Alternative

As required under NEPA and 32 CFR 989, the No Action Alternative (Alternative 2) is retained in this EA for comparative analysis. Under this alternative, JB MDL would retain the buildings in their current deteriorated, unoccupied states, with all utilities (e.g., electricity and heating, ventilation, and air conditioning systems) remaining off, and no renovations or repairs undertaken until a beneficial re-use could be found.

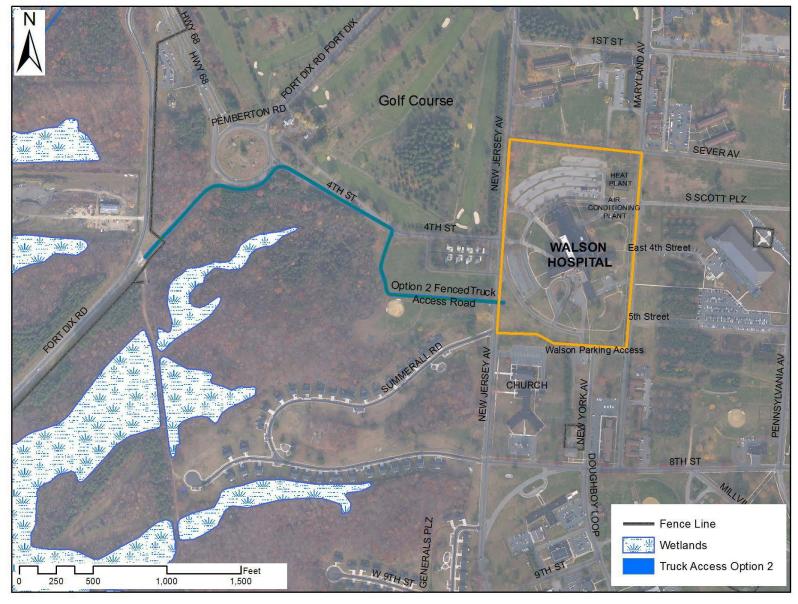


Figure 2-2. Walson Complex and Option 2 Access Road

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2.2.3 Best Management Practices

To minimize impacts on the environment, JB MDL would incorporate the following best management practices (BMPs) for the implementation of the Proposed Action:

- The contractor would submit a Burlington County Erosion and Sediment Control Plan, and receive certification of the plan, prior to commencing site work.
- A site-specific construction and operation health and safety plan, a hazardous waste management plan, and material recycling plan would be provided by the contractor, and approved by JB MDL, prior to the initiation of work on JB MDL. The plans would meet the requirements in US Army Corps of Engineers EM385-1-1, Safety and Health Requirements Manual.
- The contractor would follow the fire protection requirements in National Fire Protection Association (NFPA) 241: Standard for Safeguarding Construction, Alteration, and Demolition Operations.
- The contractor would conduct an engineering survey to determine if any chemicals, gases, explosives or flammable materials are on the work site, which may still present a hazard. The contractor would also remove the outdoor oxygen tank and any cylinders present on the property and dispose of these materials properly. The contractor would also properly dispose of fluorescent tubes in the buildings and any ozone depleting substances remaining in the air conditioning system.
- A comprehensive asbestos survey and mitigation plan (Asbestos Hazard Abatement Plan)
 would be conducted by the construction contractor and must be approved by JB MDL prior
 to commencing site work. Lighting ballasts that may contain polychlorinated biphenyls
 (PCBs) and mercury would be removed and disposed of before the demolition phase, in
 accordance with the applicable regulations at appropriate receiving facilities.
- The contractor would use ground penetrating radar before relocating any utilities. If pre-Walson era underground storage tanks (USTs) are found, the utilities would be re-routed around them and the UST locations recorded so they could be removed under a separate contract.
- The contractor would also develop and execute a workplan for identifying and sampling
 potentially contaminated soils on the site and their proposed method of removal and
 disposal per the Resource Conservation and Recovery Act, in coordination with the JB MDL
 installation restoration manager.
- All weight tickets for material landfilled or recycled would be submitted to JB MDL. All hazardous waste manifests would be signed by the JB MDL Environmental Division.
- The contractor would prepare a plan for the transport of demolition debris from the site to various disposal and recycling facilities that considers the minimum impact on local communities and the installation's residents and employees.
- The contractor would stage all equipment and materials within the project site, and limit all disturbance to the site.
- The contractor would limit work hours to 7am to 5pm Monday through Friday, to minimize
 noise disturbance to nearby residents. Exceptions to these work hours would need to be
 preapproved by the Contracting Officer.
- The demolition area would be clearly marked to ensure that only authorized personnel are allowed within restricted areas of the site.

- All building materials and foundations would be removed from the site. To minimize the
 introduction of new fill dirt, the contractor would grade the site to level off the high spots on
 the site to provide some of the fill for the current basement area of the hospital.
- The contractor would preserve trees on the site to the extent practicable. Trees along the outer perimeter of the hospital complex site would not be disturbed.
- A Digging Permit from JB MDL would be required prior to any subsurface disturbance. All
 utility lines serving the buildings would be disconnected and capped in a manner that does
 not interfere with other mission activities prior any demolition work. Before demolition
 begins, electric, gas, sewer, water, steam and overhead lines would be located and shut off,
 capped, or controlled. Water lines serving the site would be capped at the mains to
 eliminate stagnant dead ends on the system.
- The construction contractor would submit and receive approval of a complete blasting survey and plan, developed by a qualified person, as applicable. It would include transportation, storage and inventory of explosives, as well as any fire precautions to be taken. Prior to bringing explosives on-site, the contractor would receive approval and coordinate storage procedures with the Wing Safety Office. The plan would also address emergency preparation and coordination with base fire and police responders, as well as local hospitals. The plan would identify the explosive hazard area based on amount and locations of explosives to be used and identify specific buildings surrounding the project site that would need to be evacuated and/or protected during blasting. The plan would include a notification protocol for residents or employees whose buildings could be adversely affected.
- Working with the JB MDL Public Affairs Office and the base safety office, the contractor would ensure that the base population is made fully aware of any road closures or other safety measures that would affect workers or residents.
- Under Truck Access Route Option 2, the contractor would provide all appropriate measures
 to allow project trucks to safely make turns onto and off Fort Dix Road, and adequately warn
 other vehicles about the presence of slow-moving trucks entering and leaving the site.
 These measures would coordinated with the Security Forces Squadron and could include,
 but would not be limited to: the presence of flag people, flashing lights, warning signs, a
 temporary traffic signal light, and reducing the speed limit on Fort Dix Road during the
 project.
- A qualified archeologist would be present on-site to monitor work on the south side of the Complex during utility work, where remnants of a 19th century residence may be encountered (see Section 3.7.3). If archeological sites or cultural artifacts are inadvertently discovered during ground disturbing activities, JB MDL would cease all disturbance activity, secure the site(s) and contact the JB MDL CRM. The CRM would take necessary actions pursuant to the base ICRMP.
- In the event of a hazardous material or petroleum spill, the contractor would immediately contact x911 in accordance with base spill response policy.
- To reduce the potential for spills during operation, the demolition contractor would:
 - o Inspect equipment and vehicles for leaks daily.
 - Store hazardous materials and wastes in a manner that provides secondary containment in the event of a spill.

2.3 Alternatives Considered but Eliminated from Further Study

The Air Force evaluated reducing building footprint by consolidating workforce personnel and relocating them to Walson. From this consolidation, the Air Force would then demolish an equal or higher amount of building square footage across several smaller dispersed buildings. However, the initial high cost of the Walson renovation (\$72M) makes this option unlikely to be funded by the DoD in the foreseeable future. Furthermore, the Air Force is not aware of any potential new missions (singly or collectively) for JB MDL in the foreseeable future that could occupy the building while meeting all their mission criteria. Consequently, renovating this building was eliminated as an alternative for further study. Should a viable mission (with available funding) be identified for this building prior to the start of demolition, the Air Force could re-evaluate its decision.

3. AFFECTED ENVIRONMENT

3.1 General Overview

This section specifically describes current baseline environmental, cultural, and socioeconomic conditions of JB MDL. The potential direct, indirect, and cumulative effects of the Proposed Action components and alternatives on each of the resources are addressed in Section 4.

3.1.1 Project Location

The project study area is located in the Dix area of JB MDL, surrounded by Burlington County, NJ, in the central part of the State. JB MDL is located within the Pinelands National Reserve, also referred to as the Pinelands. This reserve consists of approximately 1.1 million acres in southern NJ, managed by the NJ Pinelands Commission. The Pinelands National Reserve includes portions of seven counties, including: Atlantic, Burlington, Camden, Cape May, Cumberland, Gloucester, and Ocean.

3.1.2 Scope of Affected Environment

This EA evaluates the individual and cumulative effects of the following alternatives with respect to land use, air quality, soils, water resources, biological resources, cultural resources, socioeconomics, infrastructure, materials and waste, noise, health and safety, and transportation and traffic. The demolition would have negligible impact to environmental justice and this subject is not further analyzed in this EA.

3.2 Land Use

In the NJ Pinelands, specific areas have been designated for environmental protection, forestry, and agriculture, with growth being directed and encouraged in and around areas capable of accommodating further development. The Pinelands Comprehensive Management Plan zones JB MDL as "Military and Federal Installation Area" defined as Federal enclaves within the Pinelands. Permitted uses are those associated with function of the installation or other public purpose uses (NJ Pinelands, 2011).

The Walson Complex is located in the Dix cantonment area. The complex is surrounded by enlisted and officers quarters to the north and northeast, the 99th Regional Support Command Headquarters to the east, a family sports center to the southeast, a religious education center to the south, and officers housing to the west, and a golf course to the northwest (Figure 2-2).

The closest housing areas to the Option 2 Truck Access Route are located along Colonial Plaza and Summerall Road. The closest residence would be 180 feet from the Option 2 truck route. The route would also be adjacent to an existing baseball field and within 50 feet of a small community vegetable garden for the Colonial Plaza housing area.

3.2.1 Surrounding Off-Base Land Uses

The Walson Complex is located in the Dix cantonment area, more than 1.2 miles from the nearest base boundary. There are no adjacent privately owned parcels near the project area.

3.3 Air Quality

3.3.1 Ambient Air Quality

Ambient air quality in an area can be characterized in terms of whether or not it complies with the primary and secondary National Ambient Air Quality Standards (NAAQS). The Clean Air Act (CAA) requires the United States Environmental Protection Agency (EPA) to set NAAQS for pollutants considered harmful to public health and the environment.

NAAQS are provided for six principal pollutants, called criteria pollutants (as listed under Section 108 of the CAA), including the following: carbon monoxide (CO), lead, nitrogen oxides (NOx), ozone, particulate matter (PM), and sulfur dioxide (SO₂).

Each state and locality has the primary responsibility for air pollution prevention and control. The CAA requires each state to promulgate a State Implementation Plan (SIP) that provides for implementation, maintenance, and enforcement of the NAAQS in each Air Quality Control Region in the state. In addition, the CAA allows states to adopt air quality standards more stringent than the Federal standards. Regions that comply with the standards are designated as attainment areas. In areas where the applicable NAAQS are not being met, a non-attainment status is designated (USEPA, 2007).

NJ's location along the northeast corridor between the major metropolitan centers of Boston and Washington, D.C., places NJ at the epicenter of pollutants transported from other states. In addition, westerly winds from the Ohio River Valley and nighttime reservoirs of pollutants from southern States along the Appalachian Mountain Range have been shown to contribute to high ozone and fine particulate concentrations in NJ (NJDEP, 2010). Currently, the entire State of NJ does not meet the NAAQS for ozone and is classified as moderate non-attainment for ozone.

Atmospheric ozone occurs when NOx, CO and Volatile Organic Compounds (VOCs) react in the atmosphere in the presence of sunlight (a photochemical reaction). NOx and VOCs are called ozone precursors and are regulated as a means of controlling ozone production. Motor vehicle exhaust, industrial emissions, and chemical solvents are the major anthropogenic sources of these chemicals.

The October 29, 2007 NJ SIP established general conformity budgets for McGuire AFB and Lakehurst for VOCs and NOx (NJDEP, 2007). These proposed budgets were established to provide the bases the operational flexibility to meet their missions and future missions of the DoD. There is no specific SIP budget for the Dix area.

3.3.2 General Conformity Rule

The General Conformity Provision of the CAA (42 USC 7401 *et seq.*; 40 CFR 50-87) Section 176(c), including the USEPA's implementation mechanism, the General Conformity Rule (40 CFR 51, Subpart W), requires Federal agencies to prepare written Conformity Determinations for Federal actions in or affecting NAAQS non-attainment areas or maintenance areas. Since Burlington County is currently in non-attainment status for ozone, the procedural requirements of the General Conformity Rule are in effect for the Proposed Action. Ozone producing air emissions associated with the proposed action would occur during demolition and site restoration phases. A Conformity Rule Compliance analysis is provided in Appendix B.

3.4 Topography and Soils

The Walson Complex has fairly level topography around the perimeter, with upward slopes around the building. Prior to 1960, US Geologic Survey topographic maps of the site show the site as consistently level (Figure 3-2). It is likely that soils excavated for the hospital basement were used to create the slopes currently present. The low spots on the site are on the northeast and southeast corners of the site.

The soil type within the study area is Sassafras Sandy Loam, 0 to 2 percent slopes. The Sassafras series consists of well-drained, moderately coarse textured soils. The substratum is very sandy and contains large amounts of gravel in places. These soils are moderately permeable. The loamy sand has moderately low available water capacity and fertility and low organic-matter content (USDA, 1987). Sassafras Sandy Loam is considered a Prime Farmland soil in NJ.

3.5 Water Resources

3.5.1 Regulatory Framework

Water resources at JB MDL are also regulated under Federal Clean Water Act under the jurisdiction of the NJ Department of Environmental Protection (NJDEP). NJDEP has the primary responsibility for protecting NJ's surface and ground waters from pollution caused by improperly treated wastewater and its residuals, as well as destruction of watersheds from development.

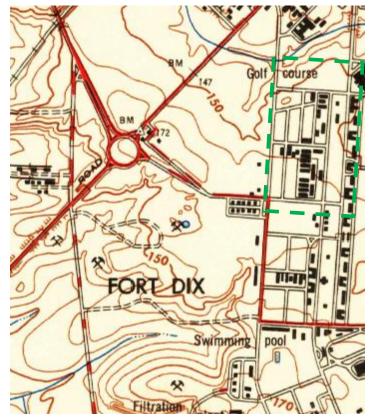


Figure 3-1. 1947 Topographic Map of the Project Area

3.5.2 Surface Water Resources

The closest water body to the project area is located 650 feet southeast and consists of a narrow unnamed tributary the ultimately feeds Willow Pond, an artificial lake, to the east.

The closest wetlands to the Option 2 Truck Access Road would be more than 240 feet to the southeast (where the access road meets Fort Dix Road).

3.5.3 Groundwater

Groundwater beneath Dix exists in two principal aquifer systems: shallow and deep. Shallow groundwater flows through the highly permeable sands of the Cohansey and Kirkwood Formations, comprising the Kirkwood-Cohansey aquifer in the Dix area (Ref. 2). This shallow groundwater system extends to depths between 20 and 75 feet below ground surface (bgs). General groundwater movement in this aquifer system is toward lowland areas where water discharges to the Rancocas Creek, Crosswicks Creek, and minor tributaries (Fort Dix, 2007).

Deeper aquifers in the Dix area include the Mt. Laurel-Wenonah, Englishtown, and Potomac-Raritan-Magothy aquifers, respectively. Deep aquifers in the Dix area are pumped extensively as a public water sources for Dix, McGuire, and Wrightstown.

A Classification Exception Area was designated site-wide for Fort Dix in February 1999 based on groundwater contamination from several contaminated sites in the cantonment area.

3.5.4 Stormwater Management

All construction projects at the base shall have site-specific soil erosion and stormwater management plans considering runoff control during and after construction. Proposed projects that

disturb more than 1 acre of soil must obtain authorization under NJ Pollution Discharge Elimination System (NJPDES) Permit No. NJG008323, or under an individual permit. The procedures and practices included in these plans shall be in accordance with the Standards for Soil Erosion and Sediment Control under Chapter 251, P.L. 1975, the Soil Erosion and Sediment Control Act and the Federal Water Pollution Control Act, 33 U.S.C. 1323.

JB MDL and its projects must comply with the stormwater requirements of the Energy Independence and Security Act of 2007, 42 USC 17001, et seq., (Section 438, Stormwater Runoff). All newly constructed drainage systems shall have a maintenance and inspection schedule as part of their design. Inspections of all major drainage facilities are conducted annually and after major storms.

3.6 Biological Resources

3.6.1 Regulatory Framework

Protection and management of biological resources at JB MDL is mandated by a number of laws, regulations, and guidance documents. The primary statutes, regulations, EOs, and guidance that direct, and apply to, the management of biological resources at the installation include the following:

- Endangered Species Act (ESA) of 1973 (16 USC 1531 et seq.)
- Endangered Species Preservation Act of 1966 (16 USC 1531)
- Federal Noxious Weed Act of 1975 (7 USC 2801)
- Fresh Water Pollution Control Act, as amended by the Clean Water Act (33 USC 1251 et seq.)
- Fish and Wildlife Conservation Act of 1980 (16 USC 2901 et seq.)
- Fish and Wildlife Coordination Act of 1934 (16 USC 661 et seq.)
- Migratory Bird Conservation Act of 1966 (16 USC 715)
- Migratory Bird Treaty Act of 1918 (16 USC 703-711)
- Sikes Act of 1960 (16 USC 670 et seq.), and Sikes Act Improvement Act of 1997
- Air Force Instruction (AFI) 32-7064, Integrated Natural Resources Management
- EO 11988, Floodplain Management, 24 May 1977
- EO 11990, Protection of Wetlands, 24 May 1977
- EO 11991, Protection and Enhancement of Environmental Quality, 24 May 1977
- Pinelands Comprehensive Management Plan (N.J.S.A. 13:18A-1 et seq., N.J.A.C. 7:50 et seq.).

3.6.2 Integrated Natural Resource Management Plan

A Joint Base Integrated Natural Resource Management Plan (INRMP) is under development. Until the new INRMP is promulgated, natural resources for the Dix area are addressed 2007-2011 INRMP (October 2007). The INRMP provides descriptions of the natural resources present, identifies management issues, and establishes specific natural resources management activities.

3.6.3 Vegetation

Vegetation in the area of the Walson Complex is maintained lawn grass, with some ornamental trees and shrubs around the building and parking lots.

3.6.4 Mammals

Mammals that may reside or forage in the area are those typically found in suburban or urban settings in NJ, like groundhogs, raccoons, squirrels, moles, possum, and possibly fox. Deer are present throughout most of the Dix area and may graze in the project area when people are not present. During a March 22, 2012 extensive inspection of the building by five members of the JB MDL environmental team (including the basement, floors 1-3, and several upper floors), no wildlife was discovered inside the building. The most likely wildlife expected to be encountered were birds or bats. However, neither was found.

3.6.5 Special Status Species

Based on previous surveys and the Natural Heritage Database, no federally-listed or state-listed mammal species have been identified in the Walson area of Dix. The extensive wetland areas on the far western edge of the Dix area (more than 0.3 miles from the Walson complex and more than 240 feet from the Option 2 Truck Access Road) are probable habitat for the Barred owl and other wetlands species.

3.7 Cultural Resources

3.7.1 Area of Potential Effect

The Area of Potential Effect (APE) for architectural history and archaeology includes the area bounded by New Jersey Avenue, North Scott Plaza, Maryland Avenue and the Walson Access Road. The APE for archaeology includes all areas of ground disturbance associated with the proposed project. The presence of archaeological resources and the potential to affect those resources is discussed below.

3.7.2 National Register of Historic Places

There are no known archaeological sites or historic architectural resources within the project APE listed in either the National Register of Historic Places (NRHP) or the New Jersey State Register. The closest NR eligible archaeological sites are the Cherry Valley Tavern (28BU413) and the Pointville Archaeological Site (28BU542). Both sites are located approximately 1.5 miles to the southeast of the project area and were part of a mid-19th century village known as Pointville.

The closest NR eligible historic resources include Quarters 1, located .33 miles from the project site, and the Scott Plaza Family Housing Area Historic District, which is located approximately ½ mile from the project site. Quarters 1, also known as the Hartshorn-Harker House, was a mid-19th century farmhouse that was identified as potentially eligible in 1985 (LBA 1985, Zerbe 1990). Although the Walson Hospital is currently visible from the farmhouse above the tree line, it is separated from the project site by numerous trees, hedges and a golf course. Therefore, it is not considered to be a historic resource that would be affected by the proposed project.

The Scott Plaza Family Housing Area Historic District was a WWII housing development built in 1938-1939 by the Works Progress Administration (WPA). The complex of buildings included officer's quarters and garages, a large barracks and a headquarters building. The complex represents an architectural landmark for Fort Dix, changing the layout of the original Camp Dix and incorporating national trends in civilian public buildings (JCA 2008). It was determined eligible for the NRHP in 2003 (SHPO Opinion 3/7/2003). Scott Plaza is located 2,000 feet east of the Walson complex.

3.7.3 Potential for Archeological Sites

There are no known archaeological sites within the APE for the project. Base-wide archaeological surveys have been conducted within JB MDL boundaries since the mid-1980s. As a result of those surveys, numerous prehistoric and historic archaeological sites dating from the Paleo-Indian period though the early 20th century have been identified. The closest prehistoric site, site 28BU526,

located over 1 mile due west of the project site, is a multi-component settlement with artifacts and intact subsurface features that date from the Paleo-Indian through Late Woodland periods (NJSM Site form). This site is located in a much less developed section of JB MDL and although its proximity indicates that Native American populations once occupied the general vicinity of the project area, the likelihood of finding undisturbed deposits within the project area is low.

Nineteenth century roads and settlements are known to have existed within the present cantonment area, including the NRHP eligible Cherry Valley Tavern and Pointville sites. Historic maps indicate that a residence of B. Walston was located immediately to the south of the proposed hospital demolition area along the location of a former early 19th century road. Historic maps show the residence to be adjacent to but not within the APE, and the surface of the APE is likely to have been disturbed in the late 1950's. Therefore, the potential for historic archaeological sites is low.

3.7.4 Potential for Historic Architectural Resources

Walson Hospital was constructed in 1960, and is a typical example of a Cold War-era Army hospital, possibly a later adaptation of the 1953 York & Sawyer plan. The concrete building ranges from one story to nine and eleven stories in height, with metal windows. Originally constructed with three wings, it was expanded to five wings during the 1960s and 1970s, and one of the original wings was also enlarged. Walson transferred from Army to Air Force control in 1992, and was closed as a hospital under the BRAC program in 2001.

While Walson exhibits some of the features that typify a Cold War era Army Hospital (multi-story, horizontal brise-soleil, large parking lot), it is not a notable example of the type, and was not the first to be constructed from its plan. The 1960s and 1970s additions, the expansion of one of the existing wings, and replacement of original wooden windows with metal have altered the original hospital plan. The hospital does not have any significant association with the Cold War, the base's mission, or military medical history (National Register Criterion A), is not significant for its design and construction (National Register Criterion C), and has no relationship to any significant person (National Register Criterion B). Due to its expansion and alterations during the 1960s and 1970s, Building 5250 lacks integrity of design, materials, and feeling.

3.7.5 Native American Consultation

No Native American Traditional Cultural Properties, protected tribal resources, tribal rights, sacred tribal sites, or Indian lands are known to be present within the study area. The likelihood of finding Native American artifacts or sites within the project area is low, as this area has been extensively disturbed from extensive military development.

3.8 Socioeconomics

JB MDL spans more than 20 miles east to west with 42,037 contiguous acres. It is located within two of the largest counties in New Jersey, Ocean and Burlington, and bordered by 10 townships or boroughs.

The Joint Base is one of the largest employers in New Jersey - the only other entity employing more than JB MDL is the State of New Jersey. JB MDL has approximately 40,000 assigned personnel with a mix of approximately 31 percent military and 69 percent civilian. In Fiscal Year 2010, the annual payroll was approximately \$2 billion, with base contract expenditures of approximately \$2.1 billion. Service members and family members living and working on and around JB MDL contribute to an overall economic impact of \$6.9 billion to the state.

3.9 Infrastructure

The Walson Complex consists of approximately 8.15 acres of buildings, roads, and parking areas (Table 3-1).

Table 3-1. Walson Complex Infrastructure

Infrastructure	Footprint (square feet)		
Hospital ¹ , building 5250	97,819		
Air Conditioning Plant, Building 5251	2,170		
Boiler/Heat Plant, Building 5252	5,693		
Access Roads	138,000		
Parking Areas	111,230		
Total	354,912 (8.15 acres)		

¹ The hospital contains 384,057 sf total (all floors)

JB MDL has 1,4014,376 gross square feet (gsf) of buildings¹. Of this, 4,968,149 square feet (sf) occurs on McGuire, 6,346,063 sf occurs on Dix, and 2,700,164 sf occurs on Lakehurst. The three Walson buildings make up 391,920 sf, or 2.8 percent of current base building square footage.

The hospital's electricity and heating system are shut off. During a March 22, 2012 visual inspection of the hospital, the first two floors (that formerly housed the administrative areas and operating rooms) were found to have extensive water and mold damage. The wall coverings were peeling in nearly every space, ceiling tiles were wet or on the floor, and puddles were prevalent throughout. Nearly every wall surface contained extensive mold. The upper floors within the taller wings of the building, that contained patient beds, appear to have very little water damage. However, many of the walls and ceilings show a moderate amount of damage from past removal of equipment, furniture, and utilities. There were at least 3 compressed gas cylinders and minor amounts of hazardous materials present in the basement utility spaces.

There are several buried utility lines that cross through the complex or were feeder lines for the Hospital. There may also be utility tunnels between the air conditioning plant and steam plant and the hospital within the complex.

A small commemorative headstone is located on the site on the northwest corner. It reads:

We Seek to Heal

Dedicated to all the Soldiers and loyal civilian employees of

Walson Army Community Hospital

In recognition of their untiring dedication and devotion to the health care mission of the Fort Dix-McGuire Community. This monument stands in testament to their courage and professionalism

15 March 1960 – 1 October 1992

Project Officers Col. Malachi B. Jones, MS CPT Amy B. Brock, AN

The headstone was dedicated on October 1, 1992, the day that the hospital was transferred from the Army to the Air Force under the Base Realignment and Closure Act and renamed Walson Air Force Hospital.

¹ From ACES database, as of 21 February 2012.

3.10 Materials and Waste

JB MDL adheres to a Hazardous Material Control and Management Plan which defines the procedures for the handling and disposal of hazardous waste. According to the management plan, each department and tenant must possess a Hazardous Waste Coordinator and Spill Response Coordinator. The base HAZMART process receives hazardous materials at a central location where they are distributed on an as-needed basis and their usage and disposal are tracked. The Spill Response Coordinator and/or the Hazardous Waste Coordinator must be contacted in the event of a spill.

An Environmental Baseline Survey (EBS) conducted for the hospital in 2001 identified several areas of potential environmental contamination (URS, 2001). These include:

- Asbestos-containing black mastic applied to the inside of concrete block exterior walls.
- A vertical chase of air ducts with asbestos insulation.
- Potential mercury in some of the sink traps.
- Lighting ballasts that may contain polychlorinated biphenyls (PCBs).
- Possible underground storage tanks (USTs) associated with former buildings on the site.

A preliminary site inspection survey was conducted by the US Army Corps of Engineers, Geo-Environmental Section on March 19 and 20, 2012. Their findings included:

- Most of the lighting elements have been removed along with PCB-containing ballasts.
 Some x-ray shadow box viewers and exit signs did contain fluorescent bulbs and condensers.
- Most sinks and traps have been removed. A few remaining were scanned using a mercury vapor analyzer. Most results ranged from background (0.5 micrograms/cubic meter [μg/m³]) to 3.6 μg/m³. A drain on the 3rd floor had a peak concentration of 30 μg/m³.
- Older model smoke detectors were observed in a few locations on upper floors. The most common type of smoke detector contains a small amount of Americium-241, a radioactive material. In the early days of smoke detector manufacturing, the amount of radioactive material used was larger than those manufactured in the past 20 years. Some very early detectors used Radium-226. Detector companies accept returned radioactive detectors for disposal as hazardous waste.
- One thermostat containing three vials of mercury were found on the first floor.
- Emergency lights contain batteries that need to be removed or recycled.

The hospital building (5250) has had numerous asbestos abatements throughout its history. All asbestos has been removed except for two locations. The first location is an inaccessible pipe chase running from the basement to the ninth floor, and the second location is the interior side of the outside perimeter shell of the hospital. The pipe chase asbestos insulation is friable and a Regulated Asbestos Containing Material (RACM).

The interior shell has a painted black mastic vapor barrier containing asbestos. This material is Category II Non-friable Asbestos-containing Material. This means any material, excluding Category I non-friable asbestos-containing material, containing more than one percent asbestos as determined using methods specified in appendix A, subpart F, 40 C.F.R. Part 763, Section 1, Polarized Light Microscopy that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure (Mason, 2012).

Generators of RACM shall submit a written notification of intention to demolish in accordance with 40 CFR 61.145 to 61.155 and N.J.A.C. 7:26-2.12(d) and (e) to the USEPA, NJ Department of Community Affairs, NJ Department of Labor, and NJ Department of Health and Senior Services at least 10 days prior to beginning the demolition activity.

The hospital included an x-ray room, where the walls and doors were lined in lead. The building probably has lead-containing paint. However, debris which is coated in lead-based paint is not subject to hazardous waste determination. Such materials are considered non-hazardous waste that may be disposed of in a municipal solid waste landfill.

3.11 Human Health and Safety

3.11.1 Demolition Safety

According to Occupational Safety and Health Administration (OSHA), demolition work involves many of the hazards associated with construction. However, demolition incurs additional hazards due to unknown factors such as: deviations from the structure's design introduced during construction, approved or unapproved modifications that altered the original design, materials hidden within structural members, and unknown strengths or weaknesses of construction materials.

In the heavy and civil engineering construction sector in NJ, the rate of injury cases per 100 full-time workers is 3.7 (BLS, 2010).

3.11.2 Mold

The first three floors of the Walson Hospital have extensive water damage and mold growth. According to the Centers for Disease Control, some people are sensitive to molds. For these people, exposure to molds can cause symptoms such as nasal stuffiness, eye irritation, wheezing, or skin irritation. Some people, such as those with serious allergies to molds, may have more severe reactions. Severe reactions may occur among workers exposed to large amounts of molds in occupational settings. Severe reactions may include fever and shortness of breath. Some people with chronic lung illnesses, such as obstructive lung disease, may develop mold infections in their lungs (CDC, 2012).

3.11.3 Site Contamination

There are no Installation Restoration sites identified within a quarter-mile of the project site boundary. As discussed in Section 3.5.3, a Classification Exception Area was designated site-wide for Fort Dix in February 1999 based on contamination from several contaminated sites in the cantonment area. There were three USTs removed from the Walson Complex on the south side of Building 5252 in March 1998. Each had a capacity of 25,000-gallons and had contained No. 6 fuel oil. A fourth UST (1000-gallon, No. 6 fuel oil) was removed September 1998 south of Building 5252 and east of the former loading dock. A 4000-gallon UST containing diesel fuel was removed west of Building 5250 in December 1998. There was no evidence of soil contamination during the removal of these tanks.

Just west of New Jersey Avenue is a former Practice Mortar Range that operated from the late 1940's to 1959. From past investigations, only inert projectiles have been found on the former range. A No Further Action decision was reached on 72 of the 123 acres of the range after a geophysical investigation and removal action was completed in support of housing construction prior to 2004. A remedial investigation on the remaining 51 acres will commence in Summer 2012. The Walson complex is not within the delineated area of this range and no site investigation is planned on the complex site (Lewendowski, 2012).

3.12 Transportation and Traffic

Commercial traffic (trucks) traveling to and from the Dix area use Checkpoint 9 off of Saylors Pond Road. Checkpoint 9 is available 24 hours a day, but is actively manned between 5am and 4:30 pm. Trucks arriving outside those times are instructed to call security for entrance. Based on data from the 2011 Joint Base Regional Transportation Mobility Study (T&M, 2011), Checkpoint 9 received 3,813 trucks (inbound) on one day in November 2010. The peak hours were between 6am and 8am where an average of 460 trucks entered per hour. Between 8 am and 5pm, the gate received 180 trucks per hour. Between 7am and 5pm (the work hours under the Proposed Action), the gate received 2,089 vehicles (see Appendix C).

The primary routes from this checkpoint include: Saylors Pond Road (Route 670), Route 68, CR 537, Route 206, CR 616, and CR 528. Several small towns are located within 5 miles of the gate along these routes, including Wrightstown, Pemberton, Cookstown, and New Egypt. Major highways in the area include the NJ Turnpike and I-295 to the west and Route 70 to the south (see Figure 3-3).

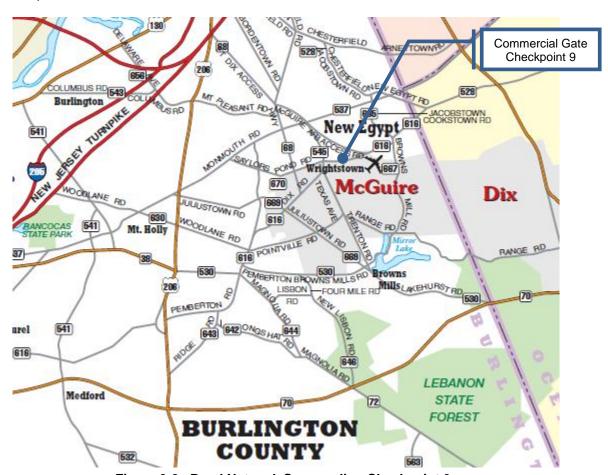


Figure 3-2. Road Network Surrounding Checkpoint 9.

Based on NJ Department of Transportation data for Fort Dix Road, the average daily traffic from January 29, 2008 and January 30, 2008 was 6,567 vehicles, with nearly an even split between the northbound and southbound lanes (Appendix C). Peak eastbound traffic (towards the Route 68 gate) occurs between 6am and 9am, with an average of 340 vehicles per hour and a peak of 520 vehicles per hour. Peak afternoon traffic (westbound) occurs between 2 pm and 5 pm, with an average of 438 vehicles per hour, with a peak of 497 vehicles per hour.

4. ENVIRONMENTAL CONSEQUENCES

4.1 General Overview

This section identifies potential direct and indirect effects of the alternatives for each resource area described in Section 1 and compares and contrasts the potential effects of those alternatives. The potential environmental, cultural, and socioeconomic effects of implementing each identified alternative, as well as any required mitigation associated with each alternative, are also presented.

4.2 Land Use

4.2.1 Effects of Alternative 1

No significant adverse land use impacts would be anticipated due to implementation of Alternative 1. After the demolition, the site would revert to an open lawn area that could later be redeveloped for other mission uses.

4.2.1.1 Effects of Option 1 Truck Route

Under Option 1, trucks would travel on existing base roads. There would be no effect on land use.

4.2.1.2 Effects of Option 2 Truck Route

Under Option 2, a new temporary truck route would use a grassy path once associated with a road up to the Dix traffic circle. It would also create a parallel path next to the circle and create a route through a grassy field between two housing areas. The path between the housing areas would introduce high noise levels from truck during daytime hours that would likely be an annoyance to residents. However, trucks would not operate during evening or overnight hours to minimize disturbance. The truck route would be next to a baseball field and through an open field where children are likely to play. It would also be within 50 feet of community garden for the Community Plaza residences. While the truck route would be fenced, preventing accidents, it would disrupt some recreational and gardening activities in the area for a period of up to 18 months. Overall, the temporary changes in land use from Option 2 would not be significant, as the area would be restored to its original configuration after the project is completed.

4.2.2 Effects of Alternative 2 (No Action Alternative)

No adverse land use impacts would result from Alternative 2.

4.3 Air Quality

4.3.1 Effects of Alternative 1

Fugitive dust from on-site construction activities and mobile source emissions from construction vehicles, equipment, and the motor vehicles of construction workers would occur. Project construction would involve wrecking, hauling, grading, possibly blasting, and other typical demolition and restoration activities. Exhaust emissions from construction vehicles, personal vehicles, soil erosion, and fugitive dust are all construction issues that would cause minor, short-term air quality impacts.

An implosion of the building would generate a large amount of airborne particulate matter in a very short timeframe. With several housing units and barracks buildings in the area, the dust generated from demolition activity would likely be a concern to on-base residents. Nearby residents would be notified by the Safety Office to keep their windows closed, turn off air circulation equipment, and temporarily leave the area in advance of an implosion or other high dust generating activities.

Overall, the dust during demolition could be reduced by enforcing a dust control plan in place that involves removing dust generating building materials, pre-wetting of the building and use of specialized dust control equipment.

Based on the analysis provided in Appendix B, temporary construction-related emissions would be approximately 15.3 tons of NOx and 2.5 tons of VOCs (without adding truck access route options). Under the highest emission truck route option (Option 2), the total project emissions would be 16.865 tons of NOx and 2.616 tons VOCs.

These emissions would not be regionally significant; therefore, the Record of Non-Applicability (RONA) satisfies the General Conformity Rule. As such, the RONA documents JB MDL's decision not to prepare a written conformity determination for the Proposed Action. BMPs, as described in Section 2.2.3, would sufficiently minimize airborne particulate emissions to less than significant levels. Mobile source emissions during construction would result in direct, minor, short-term adverse air quality impacts.

Due to the extensive amount of mold in the hospital, workers that might be sensitive to mold or who work in the building for a prolonged period of time would be advised to wear respiratory protection and gloves.

4.3.1.1 Effects of Option 1 Truck Route

It is assumed that the overall distance and related air emissions of truck travel to and from the Walson Complex under both truck route options would be essentially the same. The difference in the options would be that there would be potential for trucks to wait and idle at Checkpoint 9 under Option 1 (during peak hours) and up to an additional 1523 truck trips under Option 2 to delivery and remove materials needed for the temporary truck route. See Section 4.10 for material delivery calculations.

Although delays at Checkpoint 9 for inspecting trucks can vary based on time of day and amount of truck traffic, evidence from other high construction activity time periods indicates that trucks have waited at the gate for sometimes hours (Chominski, 2012). For purposes of NOx and VOC analysis, it is assumed that trucks waiting at the gate would shut down their engines when the wait would be over 5 minutes between movements. Additionally, not all trucks would have the same wait time. But for simplicity and to be conservative, it was assumed that each truck would idle on average for up to 40 minutes at the gate. Under this assumption, Option 1 would result in the emission of 0.97 tons of NOx and 0.10 tons of VOCs. The addition of these emissions to those of the rest of the project would result in overall emissions that are relatively low and that would not be regionally significant (see Appendix B)

4.3.1.2 Effects of Option 2 Truck Route

The construction and removal of the temporary truck route (fence installation, gravel delivery and laydown) would generate 1.59 tons of NOx and 0.17 tons of VOCs; 60 percent more ozone precursor air emissions than under Option 1. The construction, use, and removal of the route would also increase localized fugitive dust emissions. The addition of these emissions to those of the rest of the project would result in overall emissions that are relatively low and that would not be regionally significant (see Appendix B).

4.3.2 Effects of Alternative 2 (No Action Alternative)

The No Action Alternative would not affect air quality.

4.4 Topography and Soils

4.4.1 Effects of Alternative 1

The site topography would be altered under the Proposed Action. The hospital currently sits on a high spot, which was probably the result of re-contouring the site with the soil excavated for the basement. As stated in Section 2.2.3, to minimize the introduction of new fill dirt, the contractor would grade the site to level off the high spots on the site to fill most of the basement area of the hospital. Some additional fill dirt would be necessary to create a level surface, and the topsoil would be added prior to seeding. This would change the topography to be more consistent with its pre-Walson condition.

The contractor would obtain certification of a soil erosion and sediment control plan by the Burlington County Soil Conservation District and obtain an authorization to discharge stormwater associated with a construction activity under the NJDEP general permit.

With the adherence to the BMPs described in Section 2.2.3, there would be minimal impact to topography and soils.

4.4.1.1 Effects of Option 1 Truck Route

Option 1 would utilize existing roads and not require any grading or soil disturbance. There would be no effect on soils or topography under Option 1.

4.4.1.2 Effects of Option 2 Truck Route

Option 2 would create a temporary access route that requires some grading on the unpaved portions and the laydown of up to 2 feet of gravel. The areas graded would be included in the scope of the soil erosion and sediment control plan certified by the Burlington County Soil Conservation District and NJDEP general permit. An area less than 0.2 acres on the south side of the traffic circle by 4th Street would need several feet of fill and shoring to create a route wide enough for truck traffic. The fill in this area would remain in place after the project was completed, resulting in a minor, localized change in topography. With the use of best management practices, the overall effect on soils and topography would be minor.

4.4.2 Effects of Alternative 2 (No Action Alternative)

No adverse impacts to topography, and soils would result from implementation of Alternative 2, as the demolition would not occur.

4.5 Water Resources

4.5.1 Effects of Alternative 1

No adverse impacts to surface water resources would occur from the implementation of Alternative 1, provided that protective measures required by the Burlington County Soil Conservation District are followed. There are no wetlands or surface water features within the project area. The nearest surface water feature is located more than 650 feet from the edge of potential disturbance. The project would use minor amounts of potable water for dust suppression.

As the Walson Complex was constructed before stormwater regulations were developed, a significant amount of runoff currently enter the storm system during rain events. The restored site would eliminate paving and other impervious surface. This would have a positive impact on reducing stormwater runoff.

4.5.1.1 Effects of Option 1 Truck Route

Option 1 would have no effect on water resources.

4.5.1.2 Effects of Option 2 Truck Route

Option 2 would not affect surface water, wetlands or wetland transition areas. There would be slight grading of grassy areas to make them more level before adding up to 2 feet of gravel for a road base and soil stabilization. Using soil conservation and erosion control best management practices, there would be negligible effects on stormwater and water quality.

4.5.2 Effects of Alternative 2 (No Action Alternative)

No adverse impacts to water resources would occur from the implementation of the No Action Alternative.

4.6 Biological Resources

4.6.1 Effects of Alternative 1

The site does not provide habitat for state- or federally-listed threatened or endangered species. During a building inspection by the JB MDL environmental team on March 22, 2012, no wildlife was encountered. The NJDEP Division of Fish and Wildlife requested that the JB MDL inspect the building for the presence of bats. However, no bats were found during the 3 hour intensive inspection of the building.

During land clearing and site preparation, the construction noise and presence of workers would cause birds and animals to temporarily leave the area and seek other nearby locations to reside and forage in. At the end of the project, the site would be restored to a grassy area. This would provide about 26 acres of habitat for local grassland bird and terrestrial species, although the land could be redeveloped in the future (removing that habitat) (see Cumulative Impacts, Section 4.13.2). There would be no significant adverse impact to biological resources from the Proposed Action.

4.6.1.1 Effects of Option 1 Truck Route

Under Option 1, trucks would travel on existing base roads. There would be no adverse impacts on biological resources from Option 1.

4.6.1.2 Effects of Option 2 Truck Route

Under Option 2, up to a dozen trees would be removed along the traffic circle to create the parallel truck route. These trees next to the road do not provide significant habitat and their removal would have a minor, localized impact on vegetation.

4.6.2 Effects of Alternative 2 (No Action Alternative)

Under the No Action Alternative, there would be no land disturbance or vegetation removal. There would be no impact to biological resources under this alternative.

4.7 Cultural Resources

4.7.1 Effects of Alternative 1

As the project calls for demolition of the Walson Hospital (Building 5250) and ancillary buildings 5251 and 5252, and the area is tree lined, there would be no changes to the viewshed that would have the potential to affect adjacent historic properties. In fact, the proposed project includes returning the property to a grass covered, park-like area that would be more consistent with the landscape prior to 1960.

Walson Hospital, although currently visible from the Scott Plaza Historic District, was built in 1960 and was not part of the original viewshed in 1939. Therefore, the Proposed Action would have no adverse effect on the Scott Plaza Historic District. The NRHP eligible Quarters 1 and Scott Plaza Family Housing Area Historic district are outside the APE for historic architecture and would not be affected by the proposed project.

The project site has been highly disturbed from previous construction activities and there are no documented historic or archeological resources in the project area. Historic maps indicate a 19th century residence adjacent to but not within the APE on the south side of the complex. Although very low, the potential exists in this location for the remains of historic household features (outbuildings, wells, privies) to be preserved below the level of disturbance. Planned construction in this area includes the relocation of water and sewer lines which will be accomplished through trenching. National Register eligible historic archeological resources are unlikely to occur in this area; however, a qualified archeologist would be present on-site to monitor construction on the south side of the complex during utility work and evaluate potentially eligible remains if inadvertently encountered.

Overall, the demolition of the complex would not be anticipated to have an effect on cultural resources. The State Historic Preservation Office (SHPO) concurred on May 8, 2012 that, after review of the potential historical significance of the Walson Hospital (including a detailed history and building information provided by Air Force on April 16, 2012), the property is not eligible for listing on the National Register of Historic Places and that the Proposed Action would have No Adverse Effect.

4.7.1.1 Effects of Option 1 Truck Route

Under Option 1, trucks would travel on existing base roads. There would be no impact on cultural resources.

4.7.1.2 Effects of Option 2 Truck Route

Under Option 2, trucks would travel along areas that were previously heavily disturbed from road construction or previous military development. There would be minor grading along unpaved areas of the route that is unlikely to encounter potential archeological artifacts or sites. However, a qualified archeologist would be present on-site to monitor construction and evaluate potentially eligible remains if inadvertently encountered. Overall, the Option 2 truck route would not be anticipated to have an adverse effect on cultural resources.

4.7.2 Effects of Alternative 2 (No Action Alternative)

The No Action Alternative would have no effect on cultural resources.

4.8 Socioeconomics

4.8.1 Effects of Alternative 1

Implementation of Alternative 1 would likely employ regional contractors for site preparation, demolition, material hauling, and site restoration. The project is anticipated to cost \$32 Million, and could be accomplished within 12 months. The project would temporarily employ between 30 and 100 workers at a time, varying by project phase. The project would beneficially affect socioeconomics in the region.

4.8.1.1 Effects of Option 1 Truck Route

Option 1 would result in occasional delays of truck traffic at Checkpoint 9 during peak equipment and material delivery and removal times. These delays would result extra fuel and driver costs to the contractor that cumulatively could result in additional costs to the government for the project. These delays could be offset through agreements with the contractor to evenly distribute truck arrivals and advise drivers to arrive at the gate during off-peak hours. Overall, Option 1 would have minor adverse impacts on socioeconomics.

4.8.1.2 Effects of Option 2 Truck Route

Option 2 would require approximately \$1 million in additional construction costs to provide the temporary truck route and fencing. However, this cost would eliminate the potential cost overruns resulting from the delays to truck traffic anticipated under Option 1. The temporary truck route construction and removal would result in some additional temporary jobs, resulting in a short-term positive impact to socioeconomics.

4.8.2 Effects of Alternative 2 (No Action Alternative)

There would be no impact to socioeconomics under the No Action Alternative, as the demolition would not occur.

4.9 Infrastructure

4.9.1 Effects of Alternative 1

The proposed action would reduce the amount of building infrastructure on JB MDL by 2 percent, helping the base work towards the Air Force goal of reducing infrastructure by 20 percent.

Water and sewer lines that cross the site would be relocated closer to the perimeter of the complex. With adequate protections and coordination, utility service in the vicinity would not be interrupted in an impactful way.

The memorial headstone on the site could be easily relocated to another site, either on the Walson property, or possibly another memorial park on Dix.

Overall, the Proposed Action would have a positive impact on infrastructure by eliminating obsolete and deteriorated buildings.

4.9.1.1 Effects of Option 1 Truck Route

Under Option 1, trucks would travel on existing base roads and use the existing commercial gate. There would be no impact to infrastructure under Option 1.

4.9.1.2 Effects of Option 2 Truck Route

Under Option 2, the contractor would create a temporary, dedicated fenced access route from Fort Dix Road to the project site. The proposed truck route would not result in permanent infrastructure changes and would not adversely affect other structures or utilities.

4.9.2 Effects of Alternative 2 (No Action Alternative)

The Walson Complex buildings would remain in a deteriorated state with no repairs made. The further deterioration of the buildings would continue to make them undesirable for future reuse.

4.10 Materials and Wastes

4.10.1 Effects of Alternative 1

Primary demolition debris would consist of structural steel, concrete, and asphalt. Based on an EPA study, the estimated amount of demolition debris would be on average 58 pounds/square foot (USEPA, 2009). Using this value, the demolition would generate about 30,962 tons of building debris (see Table 4-1). Most of this waste would consist of concrete and metal, which would be source-separated and recycled to the maximum extent practicable. Assuming one truck can haul up to 12 tons, this amount of demolition waste would consist of up to 2,841 truckloads². According to

² Truck numbers were increased by 10 percent assuming potential for less than maximum loads (see Table 4-1).

the NJ Department of Environmental Protection list of Approved Class B³ Recycling Facilities, there are 18 facilities in the local region (across Burlington, Ocean and Monmouth Counties) that recycle concrete. There are six qualified ferrous metal recyclers in Monmouth County (none in Ocean or Burlington). There are 25 additional ferrous metal recyclers in NJ.

The site also has approximately 52,000 square feet of asphalt paving within the complex. Asphalt removal would result in another 7.880 tons of debris. There are 16 qualified Class B asphalt recycling facilities in the local region (Burlington, Monmouth and Ocean Counties) that could accept this material.

Fill dirt would be delivered to the site to partially fill the basement, and bring the site to a level condition. Additionally, top soil would be delivered, where needed, prior to seeding with grass. Approximately 21,738 cubic yards (or about 32,280 tons) of fill and topsoil would be needed for the project.

With the building demolition, removal of asphalt paving and the addition of fill dirt, the total number of truckloads for the project would be approximately 5,925 (see Table 4-1).

Weight **Trucks** Depth Conversion Volume (cy) Item Area (sf) (feet) Factor (tons) (+10%)158 lbs/sf¹ 384,057 30340.5 2,782 Walson Hospital 158 lbs/sf Boiler plant 5,693 449.7 42 158 lbs/sf 171.4 17 **AC Plant** 2,170 1,380 lbs/cv² Parking Lots 37,077 1 1,373.22 2821.3 87 1,380 lbs/cv Access Roads 14,878 1 551.04 5095.4 36 97,819 2,970 lbs/cy² 32280.3 12 21,737.56 2,961 Fill Dirt 5,925

Table 4-1. Estimates of Demolition Waste, Walson Complex

Sources: (1) USEPA, 2009; (2) CalRecycle, 2010, Note: Truck numbers were increased by 10 percent assuming potential for less than maximum loads.

Total

Whenever heavy equipment is operated, there is potential for inadvertent spills or leaks of fuel or hydraulic oil. The potential for spills or leaks would be minimized provided that the BMPs described in Section 2.2.3 are implemented. Overall, with recycling and hazardous material abatement, there would be no significant adverse impacts on materials and wastes.

4.10.1.1 Effects of Option 1 Truck Route

Under Option 1, trucks would travel on existing base roads. There would be no impact to materials and wastes under Option 1.

4.10.1.2 Effects of Option 2 Truck Route

Under Option 2, the contractor would create a temporary, dedicated fenced access route from Fort Dix Road to the project site. Unpaved portions would be graded, with filter fabric installed and up to 2 feet of gravel laid on top. The entire route would be fenced from Fort Dix Road to the Walson Complex to provide security. The installation of the temporary road would require additional materials, such as pre-manufactured chain link fencing, filter fabric, crushed gravel, and fill dirt. Table 4-2 lists the anticipated quantities of additional materials and truck deliveries.

³ Class B recyclable material" means a source separated recyclable material which is subject to Department approval prior to receipt, storage, processing or transfer at a recycling center in accordance with N.J.S.A. 13:1E-99.34b, and which includes source separated, non-putrescible, waste concrete, asphalt, brick, block, asphalt-based roofing, scrap and wood waste.

All the materials needed for the truck route would be readily available from regional suppliers. The gravel and fence materials would be removed at the end of the project and would be sold or reused by the construction contractor.

Table 4-2. Option 2 Truck Access Road Materials

Fence Materials	Linear Feet	Section Length	Number of Sections	Sections per Truck	# of Truck Deliveries	Total Trucks (with removal)
Chain Link Fence	6620	8 feet	828	20	42	84
Road Base	Area (sf)	Depth	Volume (cy)	Conversion Factor	Total Weight (tons)	Trucks (+10%)
Crushed Gravel	62681	2 feet	4643.04	2,565 lbs/cy	5954.7	1,094
Fill Dirt	9900	8 feet	2933.33	2,970 lbs/cy	3762.0	345
			Total			1,523

Notes: Crushed gravel and fencing would be removed at the end of the project, doubling the number of trucks associated with those materials.

Whenever heavy equipment is operated, there is potential for inadvertent spills or leaks of fuel or hydraulic oil. Spills along the gravel areas of the route would be more difficult to detect and clean up than spills on pavement. The potential for spills or leaks would be minimized provided that the BMPs described in Section 2.2.3 are implemented. The contractor would be responsible for remediating any hazardous material or fuel spills along the truck route.

Overall, with recycling and hazardous material abatement, there would be no significant adverse impacts on materials and wastes.

4.10.2 Effects of Alternative 2 (No Action Alternative)

There would be no impact to material supplies or waste generation levels under Alternative 2, as the demolition would not occur.

4.11 Human Health and Safety

4.11.1 Effects of Alternative 1

A project-specific health and safety plan would be provided by the contractor, and approved by JB MDL, prior to the initiation of work on JB MDL (Section 2.2.3). By adhering to applicable health and safety regulations, as well as disposal regulations, the asbestos in the building should not pose a significant adverse impact to construction workers, or the general public. All hazardous materials would be removed from the building prior to its demolition, eliminating health risks from the spread of hazardous chemicals.

All construction and demolition activities are inherently dangerous. Health and safety concerns include: the movement of heavy objects, including construction equipment; slips, trips and falls; the risk of fire or explosion from general construction activities; and spills and exposures related to the storage and handling of chemicals and disposal of hazardous waste. Statistically, the project could result in between 3 and 4 workplace injuries (assuming 100 employees) (see Section 3.11.1). However, the selected construction firm would be prequalified based on past experience. The contractor would develop a Worker Protection Plan/Accident Prevention Plan that would implement Occupational, Safety and Health Administration requirements (1910 and 1926) and define policies, procedures, and practices implemented during the demolition process to ensure the protection of the workforce, environment and the public.

Airborne dust from demolition activities could be a minor, short-term health hazard for site-workers and adjacent residents. The use of dust mitigation measures, such as wetting of materials and soil, would reduce health effects from dust to minor levels.

Noise from demolition activities and truck traffic would pose a short-term, moderate impact on local residents. By limiting site work to daytime hours, the effects of noise would be less than significant.

The former Practice Mortar Range is located to the west of New Jersey Avenue, outside the Walson complex, and it would be unlikely for workers to encounter projectiles during the demolition and site restoration of the Walson complex. However, if projectiles were discovered, they would likely be inert and not pose a safety hazard. Nevertheless, the contractor would treat any ordnance finds as if they were potentially explosive, report them immediately to the base police, and follow JB MDL unexploded ordnance safety protocols.

With the adherence to an approved project-specific Health and Safety Plan (including a Worker Protection Plan), there would be no significant adverse impacts to health and safety from Alternative 1.

4.11.1.1 Effects of Option 1 Truck Route

Under Option 1, trucks would travel on existing base roads. There would be no change to traffic routes or traffic safety under this option.

4.11.1.2 Effects of Option 2 Truck Route

Traffic safety impacts anticipated under Option 2 are provided in Section 4.12.1.2. With the use of traffic safety best management practices in Section 2.2.3, the effects on safety would be minor.

4.11.2 Effects of Alternative 2 (No Action Alternative)

There would be no impact to human health and safety under Alternative 2, as the demolition would not occur.

4.12 Transportation and Traffic

4.12.1 Effects of Alternative 1

The Walson demolition project would require approximately 5,925 truck trips to mobilize equipment, haul debris, and deliver materials over a period of about 18 months. Because these trips would occur between different landfills, recycling facilities, and fill suppliers, the trips would not be concentrated on a single route. However, the addition of these trucks to local roads around Dix could cause moderate, temporary traffic at local intersections, particularly in nearby towns.

As stated in Section 2.2.3, the contractor would prepare a plan for the transport of demolition debris that would aim to minimize impact to local communities and installation residents and employees. Nevertheless, there would be instances of temporary traffic delays when several trucks would convoy on single-lane secondary roads in the area, or in towns with several traffic lights. To address periods of the project where dozens of trucks would need to arrive or depart in a short period of time, the contractor would contact gate security to develop a plan to minimize gate delays and avoid peak traffic times. With these best management practices, the impacts of Alternative 1 on local traffic and transportation routes would be less than significant.

4.12.1.1 Effects of Option 1 Truck Route

Under Option 1, trucks would travel on existing base roads and use the existing commercial gate. Traffic patterns would not change, although there could be periods of high levels of truck traffic along Saylors Pond Road if the gate becomes backed up.

Assuming demolition debris and fill dirt hauling (5,923 trucks) occurs over a period of 8 weeks, the average daily (weekday) truck traffic arriving at Checkpoint 9 would be 148 trucks. If these trucks arrived between 7 am and 5pm, the gate traffic would only increase by 7.1 percent for that time period. In terms of overall traffic volume, Option 2 would have a minor impact on Checkpoint 9 traffic levels.

4.12.1.2 Effects of Option 2 Truck Route

About 5925 truck loads would be needed to remove the demolition debris and provide fill dirt at the project site (Table 4-1). Under Option 2, an additional 1523 truck trips would be needed for the access road construction and removal (Table 4-2). Truck traffic would occur at different intensities during different phases of the project. The most truck traffic would occur during the removal of demolition debris, but the highest intensity could occur during the start of the project to construct the access road and deliver equipment to the project site. Assuming 940 trucks would be required for constructing the access road over a period of 4 weeks, the average daily truck traffic would be 47 trucks. Assuming demolition debris and fill dirt hauling (5,923 trucks) occurs over a period of 8 weeks, the average daily (weekday) truck traffic would be 148 trucks. If these trucks arrived and departed on the same day (e.g., 296 individual truck trips between 7 am and 5pm), the traffic on Fort Dix Road would only increase by 5.3 percent. In terms of overall traffic volume, Option 2 would have a minor impact on Fort Dix Road.

Trucks would enter the base from Fort Dix Road at an unsignalized area without a median turning lane. The posted speed limit on Fort Dix Road in this area is 50 miles per hour. The truck entrance point would also occur at a slight bend in the road, with southbound traffic heading downhill toward the entrance. There are shoulders on both sides of the road that could be used for truck acceleration/deceleration when they are in the northbound direction. Trucks heading in a southbound direction on Fort Dix Road arriving to the entrance would block the traffic lane while waiting to turn. Similarly, trucks entering Fort Dix Road from the project site needing to head south would need to wait for a lull in traffic in both directions to safely enter the road. However, the contractor could arrange for a flag person in the road could halt traffic to facilitate truck turns.

To reduce the potential for traffic accidents, the contractor would provide all appropriate measures to allow project trucks to safely make turns onto and off Fort Dix Road, and adequately warn other vehicles about the presence of slow-moving trucks entering and leaving the site. These measures would coordinated with the Security Forces Squadron and could include, but would not be limited to: the presence of flag people, flashing lights, warning signs, a temporary traffic signal light, and reducing the speed limit on Fort Dix Road during the project. By implementing these traffic management strategies, the impacts to traffic safety and traffic flow would be minor.

4.12.2 Effects of Alternative 2 (No Action Alternative)

There would be no impact to transportation or traffic under Alternative 2, as the demolition would not occur.

4.13 Cumulative Impacts

The CEQ regulations implementing NEPA requires the consideration of cumulative impacts as part of the process. "Cumulative impacts result from the incremental impact of the Proposed Action when added to other past, present and reasonably foreseeable future actions" (40 CFR 1508.7). Secondary impacts are those that are caused by the Proposed Action, but may occur later in time or farther removed in distance, relative to the primary impacts of the Proposed Action.

Relevant actions (those that could result in cumulative impacts) include regulations, policies, and trends related to land use and infrastructure. Relevant actions also include projects planned within 5 miles of the study area that could compete for resources or affect transportation systems, infrastructure, or land use.

4.13.1 Cumulative Impacts of Land Use and Infrastructure Projects, Policies, and Trends

4.13.1.1 Planned Demolition Projects, JB MDL

JB MDL has approximately 1200 buildings totaling 14,014,376 gsf of space. To reach the Air Force 20 percent infrastructure reduction goal, demolition projects have been slated for each of the three JB MDL areas.

McGuire

Between Fiscal Years (FYs) 2009 and 2011, 22 buildings totaling 245,500 sf were demolished. These consisted of all types of buildings, including dormitories, warehouses, administrative buildings, mechanical facilities, and mission buildings.

There are plans to demolish three other buildings on McGuire in FY 2012. Building 1911 is a two-story base operations building constructed in 1957. The buildings past and current functions have been to support the day-to-day operations of the base. Building 2101 was constructed 1956 as a district heating plant for McGuire AFB. Building 2304 is a one-story base operations building, built in 1955. These buildings are between 2.1 and 2.8 miles northeast of Walson, on the McGuire area of JB MDL. Collectively, these three buildings would remove 27,820 sf of building footprint across JB MDL.

In out years (Fiscal Years 203 through 2017), there are plans to demolish 14 additional buildings, most of them dormitories, totaling 187,000 sf.

Lakehurst

There are plans to demolish three test support buildings on Lakehurst (Building 395, 486, and 564) within the next 1-2 years. These buildings total 1,782 sf.

The proposed Aircraft Carrier Aviation Integrated Test Facility and Aircraft Launch and Recovery Equipment Testing and Evaluation Consolidated Facility would construct a new 52,500 sf facility north of the Test Runway, and afterward demolish 24 scattered and primarily small, antiquated buildings (built between 1956 and 1964) with a combined floor area of 87,284 sf. This would result in a net reduction of 34,784 sf of building space. This project is slated for Fiscal Year 2016.

Dix

There are 55 demolition projects programmed for the Dix area in FY12, totaling 30,600 sf. These consist primarily of small range support buildings, such as weapons racks, latrines, bleacher enclosures, and towers.

4.13.1.2 JB MDL Master Plan

JB MDL is currently working on a new master plan that addresses long-term planning across all three portions of the base. Within the project area, the plan will be outlining an Area Development Plan for a new town center concept. The town center concept will include a preferred alternative that shows future potential redevelopment of the Walson Complex as an office park with mixed use development, with courtyards and shaded walking path.

4.13.1.3 Area Road Projects

According to the FY2012-2021 Statewide Transportation Improvement Program (NJDOT, 2012), there is a project slated for FY2012 to replace the Hanover Street Bridge over the Rancocas Creek, located 0.2 miles north of County Route (CR) 530. The new structure will retain two travel lanes, but add sidewalks and shoulders to accommodate bicycles and pedestrians. This bridge is a primary route from the southern gate on Dix towards Route 70.

There is also a project to reconstruct CR 530 from Route 206 to CR 644 to improve safety, reduce accidents, facilitate left-turn movements with a continuous center left-turn lane, and add shoulders. This is a multi-year project that will occur between FY12 and FY17.

Route 70, south of JB MDL, is slated for repaving in FY15 between Pemberton Township and Manchester Township, for about 6 miles. If this project is reprogrammed to occur earlier, it could coincide with the Walson demolition project.

4.13.2 Cumulative Impacts Associated with the Proposed Action (Alternative 1)

Without the Walson demolition project, JB MDL has plans to demolish 60,200 sf of buildings out of its current 14,014,376 gsf of space. The Walson project, if it proceeds, would be the largest single demolition project; six times larger than the other projects combined. Because the demolition projects would be geographically separated by miles in most cases, the Walson demolition would have little cumulative adverse impact on traffic, noise, and air quality.

If all the programmed demolitions and the Walson project go forward, the JB MDL would eliminate approximately 666,040 sf of buildings, or 4.8 percent of its current inventory.

The planned road improvement projects, primarily to the south of Dix, are likely to cause periods of traffic congestion or detours. The Walson project would require up to 5,925 truck trips to mobilize equipment, haul debris, and deliver materials over a period of about 9-12 months. Because these trips would occur between different landfills, recycling facilities, and fill suppliers, the trips would not be concentrated on a single route. However, these trucks would travel to and from Commercial Gate #9 on the north side of the base, and would not be likely to contribute to traffic delays in the areas of road construction described in Section 4.13.1.3.

The Walson demolition would allow future reuse of the site for mixed use/office development. Such development would result in smaller, standalone buildings on the site that would contribute to a campus-like feeling.

4.13.3 Cumulative Impacts Associated with Alternative 2 (No Action Alternative)

Under the No Action Alternative the JB MDL would not undertake the action described under Alternative 1. No cumulative environmental, socioeconomic or cultural resources impacts would be anticipated.

4.14 Irreversible and Irretrievable Commitment of Resources

An irreversible commitment of resources is defined as the loss of future options. The term applies primarily to the effects of use of nonrenewable resources such as minerals or cultural resources, or to those factors such as soil productivity that are renewable only over long periods. It could also apply to the loss of an experience as an indirect effect of a "permanent" change in the nature or characters of the lands. An irretrievable commitment of resources is defined as the loss of production, harvest, or use of natural resources. The amount of production foregone is irretrievable, but the action is not irreversible. If the use changes, it is possible to resume production.

The proposed demolition would not have irreversible impacts because the site could be developed with buildings in the future.

The primary irretrievable impacts of the Proposed Action would involve the commitment of energy, labor, material, and funds, for the demolition of the complex.

4.15 The Relationship Between Local Short-Term Uses of the Human Environment and the Maintenance and Enhancement of Long-Term Productivity

The Proposed Action would commit resources in the form of energy, labor, materials, and funds in the short-term. The justification for these commitments at this time is described in Chapter 1, Purpose and Need for the Proposed Action. Long-term productivity associated with the Proposed Action includes the ability of JB MDL to reduce its infrastructure costs that will in turn reduce federal deficits or allow more funding to be directed to the primary mission of supporting the Warfighter.

4.16 Unavoidable Adverse Impacts

During demolition there would unavoidable, although temporary, increase in construction-related noise and air pollutant emissions at the sites. There would be increased truck traffic to and from the site to deliver equipment and remove debris. The proposed demolition would require large amounts of fill dirt and consume minor amounts of water dust suppression.

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5. COMPARISON OF ALTERNATIVES AND CONCLUSIONS

As a result of the implementation of Alternative 1, the following impacts would be anticipated:

- Conversion of 26 acres of the hospital complex to open space;
- Minor, short-term adverse air quality impacts due to increased mobile emissions and demolition dust.
- Minor, short-term soil erosion from demolition and grading activities.
- Minor, positive socioeconomic impacts in the form of short-term jobs.
- Positive impact on water resources by reducing stormwater runoff at the site.

There would be no impacts associated with Alternative 2, the No Action Alternative. A summary of impacts for both alternatives, and the truck access routes under the Proposed Action is provided in Table 5-1.

Based on the analysis presented in this EA, Alternative 1 is the Preferred Alternative. The preferred truck access route is Option 2. The evaluation performed within the EA concludes that, with the adherence to BMPs in Section 2.2.3, no significant impacts would occur as a result of implementation of the Preferred Alternative. This analysis determines that an Environmental Impact Statement (EIS) is not necessary for the implementation of Alternative 1 and that a FONSI is appropriate.

Table 5-1. Summary of Impacts

Resource Area	Alternative 1- Demolish the Walson Complex (Preferred)	Alternative 1, Option 1 Truck Access Route	Alternative 1, Option 2 Truck Access Route (Preferred)	Alternative 2 - No Action Alternative
Land Use	The action would be consistent with existing and planned land use. Would convert 26 acres to open space. No adverse impact.	No impact.	Route would disrupt some recreational and gardening activities near base housing for up to 18 months. Trucks would cause localized, intermittent daytime noise impacts to residents. Impacts to land use would be short-term and minor.	No impact.
Air Quality	Construction activities would result in minor, short-term increases in air emissions. Construction dust would cause minor short-term adverse effects to air quality. The contractor would employ dust control strategies to minimize effects. Under either access route option, NOx and VOC levels for the project would not be regionally significant.	Trucks idling at Checkpoint 9 could cause one-time ozone-producing NOx and VOCs emissions of 0.97 and 0.10 tons, respectively.	Construction and removal of the access route would cause one-time ozone-producing NOx and VOCs emissions of 1.59 and 0.17 tons, respectively. Construction, use and removal of the route would also result in short-term, localized fugitive dust emissions.	No impact.
Topography and Soils	Site work would have a minor, short-term effect on soil erosion with the use of soil conservation BMPs. The topography would be changed to a more level condition, reflecting its predevelopment topography.	No impact.	Constructing the route would require filling a low area near the circle that would remain after the project. Grading and fill would have minor impacts to topography and soils.	No impact.
Water Resources	With the use of soil conservation BMPs, there would be no adverse impact to surface water resources. The elimination of impervious surface would have a positive effect by reducing stormwater runoff.	No impact.	With the use of soil conservation BMPs, there would be no adverse impact to surface water resources.	No impact.
Biological Resources	No wetlands would be affected. No federally- listed or state-listed threatened or endangered species would be affected.	No impact.	Up to a dozen trees would be removed along the traffic circle, resulting in minor impacts to vegetation.	No impact.
Cultural Resources	The site has low potential for archeological or historical sites based past disturbance. SHPO concurred with a No Adverse Effect determination on May 8, 2012.	No impact.	The access route would be located within previously disturbed areas. With the use of proposed BMPs, there would be low potential for impacts to cultural resources.	No impact.

June 2012 5-1 Joint Base McGuire-Dix-Lakehurst

Resource Area	Alternative 1- Demolish the Walson Complex (Preferred)	Alternative 1, Option 1 Truck Access Route	Alternative 1, Option 2 Truck Access Route (Preferred)	Alternative 2 - No Action Alternative
Socioeconomics	Between 30 and 100 short-term jobs would be created for the demolition project. There would be a positive short-term impact on the regional economy.	Delays at Checkpoint 9 could result in higher costs of the project, resulting in minor adverse impacts.	Construction and removal of the access route would add approximately \$1M to the contract cost, but would eliminate potential for unknown costs associated with Option 1. There would be short-term, positive impacts in the form of temporary construction jobs.	No impact.
Infrastructure	The project would demolish approximately 2 percent of JB MDL infrastructure. Overall, the Proposed Action would have a positive impact on infrastructure by eliminating obsolete and deteriorated buildings.	No impact.	The proposed truck route would not result in permanent infrastructure changes and would not adversely affect other structures or utilities.	No impact.
Materials and Waste	Demolition would result in 32,289 tons of construction waste, most of which would be source separated and recycled. All hazardous materials would be removed or abated prior to the take down of the buildings. Overall, with recycling and hazardous material abatement, there would be no significant adverse impacts on materials and wastes.	No impact.	Construction and removal of the access route would add 1,523 trucks for material delivery and removal. Gravel and fence materials could be reused or sold at the end of the project. With the use of proposed BMPs, there would no significant adverse impacts to materials and waste.	No impact.
Human Health and Safety	With proper planning and safety protocols, the demolition of the complex would not have significant adverse impacts on human health and safety.	No impact.	With the use of traffic management strategies, impacts to traffic safety would be minor.	No impact.

June 2012 5-2 Joint Base McGuire-Dix-Lakehurst

Resource Area	Alternative 1- Demolish the Walson Complex (Preferred)	Alternative 1, Option 1 Truck Access Route	Alternative 1, Option 2 Truck Access Route (Preferred)	Alternative 2 - No Action Alternative
Transportation and Traffic	The Walson demolition project would require approximately 5,925 truck trips to mobilize equipment, haul debris, and deliver materials over a period of about 18 months. The contractor would develop a transportation plan than would minimize the adverse effects of truck traffic on local communities and the base population. Nevertheless, there would be instances of temporary traffic delays when several trucks would convoy on single-lane secondary roads in the area, or in towns with several traffic lights. With proper planning and coordination, the project would have not have a significant adverse impact on transportation and traffic.	There would be no changes to traffic patterns. Traffic volume at Checkpoint 9 would be anticipated to increase by 7.1 percent during peak workdays, resulting in minor traffic impacts.	The access route would introduce a truck entrance at an unsignalized area of Fort Dix Road. With the use of traffic management strategies, impacts to traffic safety would be minor. Traffic volume on Fort Dix Roads would be anticipated to increase by 5.3 percent during peak workdays, resulting in minor traffic impacts.	No impact.

June 2012 5-3 Joint Base McGuire-Dix-Lakehurst

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6. REFERENCES

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USEPA, 2009	United States Environmental Protection Agency (USEPA). 2009. Estimating 2003 Building-Related Construction and Demolition Material Amounts. EPA 530-R-09-002. March 2009.

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7. LIST OF CONTRIBUTORS

JB MDL Contributors

Mr. Dennis Blazak, JB MDL Asset Management Flight, Deputy Chief

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Dr. Adrienne Lazazzera, PhD., JB MDL Staff Archaeologist

Mr. Thomas Trumbetas, JB MDL MILCON Project Engineer

Ms. Linda Chominski, JB MDL Programs Flight Chief

US Army Corps of Engineers Contributors

Mr. Robert Griggs, Civil Engineer, Philadelphia District

EHS Technologies Preparers

Ms. Dorothy Peterson, P.E., Senior Environmental Engineer. Ms. Peterson holds a B.S. in engineering, a M.S. in engineering management, a PE license in environmental engineering, and is a Leadership in Energy and Environmental Design Green Associate. She has over 11 years of NEPA experience with additional years of experience conducting DoD master planning and facility management, Geographic Information Systems (GIS), site remediation, pollution prevention, and ISO 14001 implementation.

Mr. Brian Taboada, Senior GIS Specialist.

Mr. Gordon Mason, Lead and Asbestos Coordinator.

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8. INTERGOVERNMENTAL COORDINATION MAILING LIST

Federal and Regional Agencies

United States Fish and Wildlife Service New Jersey Field Office, Ecological Services 927 North Main Street, Building D Pleasantville, NJ 08232 Attn: ESA Consultation

United States Environmental Protection Agency Environmental Review Section Ms. Grace Musumeci Chief of Environmental Review EPA Region 2 290 Broadway New York, NY 10007-1866

State and Local Agencies

New Jersey Department of Environmental Protection Office of Permit Coordination and Environmental Review 401 East State Street P.O. Box 423 Trenton, NJ 08625 Attn: Mr. Scott Brubaker, Director

New Jersey Department of Environmental Protection Historic Preservation Office Mail Code 501-04B P.O. Box 420 Trenton, NJ 08625-0420 Attn: Mr. Dan Saunders

New Jersey Historical Commission 225 West State Street P.O. Box 305 Trenton, NJ 08625 Attn: Ms. Sara Cureton, Acting Executive Director

New Jersey Pinelands Commission P.O. Box 359 15 Springfield Road New Lisbon, NJ 08064 Attn: Ms. Nancy Wittenberg, Executive Director

Burlington County Soil Conservation District 1971 Jacksonville-Jobstown Road Columbus, NJ 08022 Attn: Ms. Catherine Costa, Chairwoman

Joint Base McGuire-Dix-Lakehurst

NJ Division of Fish and Wildlife Mail Code 501-03 P.O. Box 420 Trenton, NJ 08625-0410 Attn: Mr. David Chanda, Director

Planning Board of Burlington County
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Mr. John Engle, Engineer/Director Planning Board of Burlington County Engineering Complex 1900 Briggs Road Mt. Laurel, NJ 08054

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APPENDIX A

Project Planning Correspondence

Summary of Correspondence Received

Date	Commenter	Description/Summary
May 8, 2012 NJ State Historic Preservation Office		Letter indicating a "No Historic Properties Affected" determination for the Walson Complex.
April 4, 2012	NJDEP Office of Permit Coordination	Letter referring to SHPO letter of March 30 and Division of Fish and Wildlife request that the buildings be monitored for bat use, and indicating appropriate timeframes for demolition if bats are found.
March 30, 2012	NJ State Historic Preservation Office	Letter requesting more information on the social historic context for the Walson Buildings.

Correspondence Sent:

Date	Office	Description/Summary
May 14, 2012	Legal Counsel	Letter to the NJ Pinelands Commission exempting the project from the application process.



DEPARTMENT OF THE AIR FORCE HEADQUARTERS AIR MOBILITY COMMAND JOINT BASE MCGUIRE-DIX-LAKEHURST

14 May 2012

Alice Veneziani, Esq. 87 ABW/JA 2901 Falcon Lane, Room 217 Joint Base McGuire-Dix-Lakehurst NJ 08641

Nancy Wittenberg, Executive Director The Pinelands Commission Post Office Box 359 New Lisbon NJ 08064

Re: Demolition of the Walson Hospital Complex at Joint Base McGuire-Dix-Lakehurst (JB MDL), Dix Area

Dear Ms Wittenberg

JB MDL plans to demolish the vacant Walson Hospital Complex on the Dix area of JB MDL in Burlington County. The Proposed Action is needed to reduce the infrastructure utility and maintenance costs at JB MDL and would help meet the Air Force strategic goal to reduce facilities and infrastructure costs by 20 percent by the year 2020.

Based on the requirements to complete facility demolition in a timely manner, it has been determined that an application to the Pinelands Commission for approval of this project would be incompatible with national defense requirements. Because there is no waiver of sovereign immunity set forth in 16 USC §471i for the establishment and administration of the Pine Barrens Area, the Pinelands Commission review of this project is hereby waived.

Although an application for the Pinelands Commission will not be submitted, a Burlington County Soil Erosion and Sediment Control Plan will be submitted to the Soil Conservation District. An environmental assessment (EA) for the project, required by the National Environmental Policy Act, is being prepared and will undergo a 30-day public comment period. JB MDL will provide a copy of the draft EA to the Commission at that time. Please contact Mr. Dennis Blazak, at (732) 323-7544, for any additional information regarding this project.

Sincerely

ALICE VENEZIANI, Chief

Environmental and Real Property Law

cc:

87 CES/CEAN

HPO Project#: 12-0782-5 HPO-E2012-106

State of New Jersey

MAIL CODE 501-04B DEPARTMENT OF ENVIRONMENTAL PROTECTION NATURAL & HISTORIC RESOURCES HISTORIC PRESERVATION OFFICE P.O. Box 420 Trenton, NJ 08625-0420

BOB MARTIN Commissioner

KIM GUADAGNO Lt. Governor

CHRIS CHRISTIE

Governor

Tel. (609) 984-0176 Fax (609) 984-0578

May 8, 2012

Mr. Kenneth Smith Chief, Natural Resources/Environmental 87th Civil Engineering Squadron Joint Base McGuire-Dix-Lakehurst, NJ 08641

Dear Mr. Smith,

As Deputy State Historic Preservation Officer for New Jersey, in accordance with 36 CFR Part 800: Protection of Historic Properties, as published in the Federal Register on December 12, 2000 (65 FR 77725-77739) and amended on July 6, 2004 (69 FR 40553-40555), I am providing continuing consultation comments on the following proposed undertaking:

Joint Base McGuire-Dix-Lakehurst Proposed Demolition of Buildings 1911, 2101, 2304, 5250, 5251, and 5252

The Historic Preservation Office (HPO) is in receipt of your letter of April 16, 2012 along with supplemental survey documentation, submitted in response to our March 30, 2012 review letter (HPO-C2012-193). The HPO has also received additional documentation regarding the proposed demolition of Walson Hospital (Buildings 5250, 5251, and 5252) and the associated truck access route via email from Dorothy Peterson of EHS Technologies.

800.4 Identification of Historic Properties

The HPO staff, in the above-referenced March 30, 2012 letter, concurred with the Air Force's determination that buildings 2101 and 2304 are not eligible for the New Jersey and National Registers of Historic Places.

It is my understanding, based upon your May 8, 2012 email to Jonathan Kinney of my staff, that Building 1911 has been removed from the demolition list and is no longer part of the proposed undertaking.

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HPO Project#: 12-0782-5 HPO-E2012-106 Page 2 of 2

Based upon a review of the supplemental survey and contextual information provided for the Walson Hospital Complex, the HPO concurs with the consultant's determination that the complex does not meet the eligibility criteria for the New Jersey and National Registers of Historic Places.

The HPO also concurs with the proposed plan for archaeological monitoring during project implementation, as described in Attachment 3.

Therefore, the HPO staff has concluded that there are **no historic properties affected** by the proposed undertaking. Consequently, pursuant to 36 CFR 800.4(d)(1), no further consultation is required unless additional resources are discovered or there is a change in the scope of work during project implementation pursuant to 36 CFR 800.13.

Thank you for providing the opportunity to review and comment on the submitted report. Please do not hesitate to contact Jonathan Kinney of my staff at (609) 984-0141 with any questions. If additional consultation with the HPO is needed for this undertaking, please reference the HPO project number 12-0782-5 in any future calls, emails, or written correspondence in order to expedite our review and response. Thank you.

Sincerely,

Daniel D. Saunders Deputy State Historic Preservation Officer

Cc:

Dennis Blazak, Joint Base McGuire-Dix-Lakehurst Dorothy Peterson, Joint base McGuire-Dix-Lakehurst Adrienne Duryee, Joint Base McGuire-Dix-Lakehurst Ken Koschek, NJDEP Shelley Coltrain, NJDEP



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
OFFICE OF PERMIT COORDINATION AND ENVIRONMENTAL REVIEW
P.O. Box 420 Mail Code 401-07J Trenton, New Jersey 08625-0420
Phone Number (609) 292-3600
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CHRIS CHRISTIE

Governor

BOB MARTIN Commissioner

Kim Guadagno Lt. Governor

April 4, 2012

Mr. Dennis Blazek 87th Civil Engineering Squadron Highway 547/Building 5 Lakehurst, NJ 08733

RE: Demolition of the Walson Hospital Complex at Joint Base McGuire-Dix-Lakehurst, New Jersey Scoping Comments for the Environmental Assessment

Dear Mr. Blazek:

The New Jersey Department of Environmental Protection's (Department) Office of Permit Coordination and Environmental Review (PCER) distributed your letter regarding the preparation of an Environmental Assessment for the proposed demolition of the Walson Hospital Complex at Joint Base McGuire Dix Lakehurst for review and comment. On behalf of the Department, we offer the following comments for your consideration.

The Department's Historic Preservation Office (HPO) provided comments directly to the Department of the Air Force in the attached March 30, 2012 letter.

The Department's Division of Fish and Wildlife's Endangered and Non-game Species Program (ENSP) requests that all buildings slated for demolition will be monitored for bat use. If bats are found to be using the building, demolition should only occur between November 15 and April 1. One exception would be big brown bats as they may overwinter in dwellings. An attempt should be made to identify the specie(s) of bats using the structures. If big brown bats are found then efforts should be made to evict the bats between July 15 and April 1 prior to building demolition.

The NJ Division of Fish & Wildlife (DFW) does not foresee any other impact to fish and wildlife resources from this project and does not have any other concerns at this time.

Thank you for giving the New Jersey Department of Environmental Protection the opportunity to comment on the preparation of an EA for the proposed demolition of the Walson Hospital

Complex. Please send six copies of the completed EA directly to our office, so that we can coordinate a comprehensive Departmental review.

Sincerely,

Scott Brubaker, Director Office of Permit Coordination

Sutt Butaker

and Environmental Review

Attachment

C: Kate Marcopul, NJDEP - HPO
 Kelly Davis, NJDEP - DFW
 Ken Koschek, NJDEP - PCER

Donna Mahon, NJDEP - PCER



HPO Project#: 12-0782-1, -2, -3, -4 HPO-C2012-193

State of New Jersey

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NATURAL & HISTORIC RESOURCES
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BOB MARTIN Commissioner

KIM GUADAGNO Lt. Governor

CHRIS CHRISTIE

Governor

March 30, 2012

Christopher A. Archer, GS-14, DAFC
Deputy Base Civil Engineer
87 CES/CD
Department of the Air Force
Headquarters Air Mobility Command
Joint Base McGuire-Dix-Lakehurst, NJ 08641

Dear Mr. Archer,

As Deputy State Historic Preservation Officer for New Jersey, in accordance with 36 CFR Part 800: Protection of Historic Properties, as published in the Federal Register on December 12, 2000 (65 FR 77725-77739) and amended on July 6, 2004 (69 FR 40553-40555), I am providing consultation comments on the following proposed undertaking:

Joint Base McGuire-Dix-Lakehurst Proposed Demolition of Buildings 1911, 2101, 2304, 5250, 5251, and 5252

These comments were prepared in response to your letter of February 6, 2012 pertaining to the proposed demolition of buildings 1911, 2101, 2304, and 5250 at Joint Base McGuire-Dix-Lakehurst as well as additional supporting documentation. The additional documentation included a summary memo and New Jersey architectural survey forms for the four buildings prepared by architectural historians from the firm of Booz, Allen, and Hamilton.

The HPO is also in receipt of a subsequent letter from Kenneth D. Smith, Chief of Natural Resources/Environmental for Joint Base McGuire-Dix-Lakehurst. Mr. Smith's letter indicates that two additional buildings (ancillary buildings associated with Building 5250, the Walson Hospital facility, are also proposed for demolition. These two additional buildings are 5251 (Walson Refrigeration/Air Conditioning Facility) and 5252 (Walson Heating Plant Facility).

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HPO Project#: 12-0782-1, -2, -3, -4 HPO-C2012-193 Page 2 of 3

800.4 Identification of Historic Properties

Buildings 2101 and 2304

In the submitted architectural survey data, the consultant concluded that Buildings 2101 (c1956 District Heating Plant for McGuire Air Force Base) and Building 2304 (c1955 Base Operations Building) are not eligible for listing in the New Jersey and National Registers of Historic Places. The buildings are not significant for their relationship to the base's mission, are not associated with persons significant in our past, and are not significant for their design and/or construction. The HPO concurs with these assessments.

Building 1911

The consultant concluded that Building 1911 is also not eligible for listing in the New Jersey and National Registers of Historic Places. Based upon the submitted documentation, Building 1911 is a generic base operations building with no distinguishing architectural elements and several alterations that have diminished the building's integrity. The survey information states that the building's historic and current functions have been to support day-to-day operations of the base and are unrelated to any mission-specific activities. Jonathan Kinney, of my staff, has discussed Building 1911 with Kenneth Smith and Adrienne Duryee of Joint Base McGuire-Dix-Lakehurst via telephone. The HPO's one outstanding concern regarding this building is that it may have been historically linked with the S.A.G.E. Building (Building 1907), which received a SHPO Opinion of Eligibility for the New Jersey and National Registers of Historic Places on 2/9/1994. Building 1911 was constructed concurrently with and directly adjacent to the S.A.G.E. complex, which is eligible as for its significance during the Cold War as part of the air defense command and control system and for its unique construction. A significant association with the historic S.A.G.E. complex could impact the eligibility evaluation for this building. Ms. Duryee advised Mr. Kinney, in a telephone conversation on 3/20/12 that she will attempt to gather additional information pertaining to Building 1911 and its historic use as it relates to S.A.G.E. and submit the information to HPO for further review. Upon receipt of this additional information, the HPO will be able to make a definitive eligibility determination for Building 1911.

Buildings 5250, 5251, 5252

Buildings 5250, 5251, and 5252 make up the Walson Hospital Complex, constructed between 1957 and 1960. The HPO staff has outstanding questions regarding the potential for eligibility of Walson under Criterion A (association with events that have made a significant contribution to the broad patterns of our history), specifically, questions regarding the historic social context of Walson Hospital. These questions include:

- How did the construction of Walson Hospital affect medical treatment for the military personnel at Fort Dix and the surrounding area? How did it compare with past practices?
- Walson represented an "ultra-modern" facility at the time of its construction and seems to represent a holistic, family-oriented approach to military medicine, offering many different types of medical services. Does this period of hospital construction represent

HPO Project#: 12-0782-1, -2, -3, -4 HPO-C2012-193

Page 3 of 3

the first time that many of these services were made available to military personnel? Is this the first time that a military hospital was constructed with the families of military personnel and possibly the surrounding community in mind?

 Did other military hospitals constructed at this time offer the same services? How does Walson compare to civilian hospitals constructed around the same time?

HPO staff has relayed these questions to Adrienne Duryee of Joint Base via telephone and Ms. Duryee has indicated that the consultant is already preparing a follow-up submission containing additional contextual information, which will be submitted to the HPO for review. Upon receipt of this additional information, the HPO will be able to make a definitive eligibility determination for the Walson Hospital Complex.

As stated in the submitted documentation, architecturally, Walson is a typical example of a Cold War-era Army hospital, possibly a later example of the 1953 York & Sawyer plan. The survey states that Walson exhibits the features that typify a Cold War-era Army hospital (multistory, horizontal brise-soleil, metal windows, large parking lot), but that it is not a notable example of the type and was not the first constructed from this plan. In addition, the hospital is not associated with persons significant in our past. The HPO concurs with the consultant's conclusion that the Walson Hospital Complex does not appear to meet the National Register Criteria for Eligibility Criterion B, C, or D.

Thank you for providing the opportunity to review and comment on the submitted report. Please do not hesitate to contact Jonathan Kinney of my staff at (609) 984-0141 with any questions. If additional consultation with the HPO is needed for this undertaking, please reference the HPO project number 10-1180 in any future calls, emails, or written correspondence in order to expedite our review and response. Thank you.

Sincerely,

Daniel D. Saunders Deputy State Historic Preservation Officer

Cc:

Kenneth D. Smith, Joint Base McGuire-Dix-Lakehurst Dennis Blazak, Joint Base McGuire-Dix-Lakehurst Adrienne Duryee, Joint Base McGuire-Dix-Lakehurst Ken Koschek, NJDEP-OPCER Shelley Coltrain, NJDEP

APPENDIX B

Conformity Rule Compliance Record of Non-Applicability

Einal	EA fo	v Dama	litian af	tha	Walson	Hospital	Cample	
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Conformity Rule Compliance Record of Non-Applicability

Project/Action Name: Demolition of the Walson Hospital Complex at Joint Base McGuire-Dix-

Lakehurst

Action Duration: **Temporary**

Conformity under Clean Air Act, Section 176, has been evaluated for the above-described project per 40 CFR Part 51. The requirements of this rule are not applicable to this action because:

Total direct and indirect emissions increases from the Proposed Action have been estimated at:

One time Construction Emissions 2.616 tons VOCs; and 16.865 tons of NOx. Operational Emissions: negligible

The emission increases from the Proposed Action are below the de minimis threshold established at 40 CFR 51.853(b) of 50 tons per year (tpy) VOCs and 100 tpy NOx, and the Proposed Action is not considered "regionally significant" under 40 CFR 51.853(i).

The supporting documentation and emissions estimates are attached.

Prepared by:

Dorothy S. Peterson, P.E. Senior Environmental Engineer

EHS Technologies, Inc.

Concurred by:

Dennis Blazak

87 Asset Management Flight

Joint Base McGuire-Dix-Lakehurst

Final EA for Demo	olition of the \	Nalson H	ospital Complex

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Record of Non-Applicability (RONA) Supporting Documentation Demolition of Walson Hospital Complex at JB MDL

1. Overview of Considered Project Alternatives

The referenced EA considers two alternatives:

- Alternative 1 the Proposed Action of demolishing the main hospital building (5250), the refrigeration and air conditioning plant (5251), and the heat plant (5252). The project would also demolish and remove associated parking lots, curbing, and walkways. The work would include the removal of demolition debris, removal of the concrete foundation and slab, hauling, disposal, excavation and backfill, and removal and termination or capping of utility services. The demolition process would be decided by the construction contractor and could include blasting or whole-building implosion (after appropriate asbestos abatement is completed and approval of a written blasting procedure). Construction debris (concrete, asphalt, metal and wood) would be recycled to the extent practicable. The site would be restored to a more natural condition, with the application of topsoil and grass seed.
- Alternative 2 No Action Alternative. As required under NEPA and 32 CFR 989, the No Action Alternative (Alternative 2) is retained for comparative analysis. Under this alternative, the JB MDL would retain the building in its current condition until a use could be found.

2. Purpose of the Record of Non-Applicability

In compliance with the General Conformity Rule (40 CFR Part 51, Subpart W) and the National Environmental Policy Act (NEPA; 42 USC 4321 et seq.), a Record of Non-Applicability be prepared in cases where the proposed increases in emissions are clearly *de minimis*.

The action would be located in the Burlington County NJ, which is designated a moderate non-attainment area for ozone according to the National Ambient Air Quality Standards (NAAQS) and EPA's green book.

de minimis is defined as "so small or minimal in difference that it does not matter or the law does not take it into consideration".

Atmospheric ozone occurs when nitrogen oxides (NOx), carbon monoxide (CO) and volatile organic compounds (VOCs) react in the atmosphere in the presence of sunlight, a photochemical reaction. NOx

and VOCs are called ozone precursors. Motor vehicle exhaust, industrial emissions, and chemical solvents are the major anthropogenic sources of these chemicals. Although these precursors often originate in urban areas, winds can carry NOx hundreds of kilometers, causing ozone formation to occur in less populated regions as well.

Therefore, VOCs and NOx emissions are regulated as a means of controlling ozone production.

Burlington County is in attainment with the NAAQS for all other criteria pollutants. While Lakehurst and McGuire portions of JB MDL have State Implementation Plan (SIP) emission budgets, the Dix portion does not.

3. Methodology

This applicability analysis evaluates all stationary and mobile sources of VOCs and NOx emitted from commuter vehicles, and related construction equipment. Emission factors were obtained from EPA sources where possible. See Section 5 for a list of references.

Demolition Emissions

Tables 1 and 2 provide the assumptions and results for air emissions from equipment delivery, demolition, removal of debris, and site restoration at the Walson Complex. The emissions are based on a "wrecking ball" approach, which would have higher NOx and VOC emissions than imploding the building. The number of trucks removing demolition debris from the site and number of trucks for fill dirt are based on the estimates in Section 4.10.1 in the Environmental Assessment.

Table 1. Road Vehicle Emissions - Alternative 1

Vehicle type	Vehicle Miles	NOx Emission Factor (g/mi)	Tons of NOx annually	VOC Emission Factor (g/mi)	Tons of VOCs annually
Light Duty Gasoline Vehicles	150,000	0.95	0.157	1.36	0.225
Light Duty Gasoline Trucks	150,000	1.22	0.202	1.61	0.266
Heavy Diesel Trucks - Mobilization/Demobilization	4,500	13.43	0.067	1.43	0.007
Heavy Diesel Trucks -Material Removal	414,610	13.43	6.138	1.43	0.654
Total	719,110		6.563		1.152

Source: USEPA, 2005. Notes: g=gram; mi = mile; Conversion factor 1 pound = 453.592 grams.

Table 2. Diesel Construction Equipment Emissions Worksheet - Alternative 1

Total hours of operation	Horse Power	Load Factor	Emission Factor – VOC (g/HP- hour)	Emission Factor – NOx(g/HP- hour)	VOC Emissions (tons)	NOx Emissions (tons)
3000	77	55	1.4	10.1	0.196	1.414
1800	158	54	0.84	10.3	0.142	1.744
1600	214	65	2.46	11.91	0.604	2.922
750	99	56	0.8	9.3	0.037	0.426
560	194	43	1.26	10.3	0.065	0.530
4800	50	73	1.2	8	0.232	1.545
2000	11	68	1.2	8	0.020	0.132
					1.295	8.714
	hours of operation 3000 1800 1600 750 560 4800	hours of operation Horse Power 3000 77 1800 158 1600 214 750 99 560 194 4800 50	hours of operation Horse Power Load Factor 3000 77 55 1800 158 54 1600 214 65 750 99 56 560 194 43 4800 50 73	Total hours of operation Horse Power Load Factor Factor VOC (g/HP-hour) 3000 77 55 1.4 1800 158 54 0.84 1600 214 65 2.46 750 99 56 0.8 560 194 43 1.26 4800 50 73 1.2	Total hours of operation Horse Power Load Factor Factor (g/HP-hour) Emission Factor – NOx(g/HP-hour) 3000 77 55 1.4 10.1 1800 158 54 0.84 10.3 1600 214 65 2.46 11.91 750 99 56 0.8 9.3 560 194 43 1.26 10.3 4800 50 73 1.2 8	Total hours of operation Horse Power Load Factor Factor (g/HP-hour) Factor – NOx(g/HP-hour) VOC Emissions (tons) 3000 77 55 1.4 10.1 0.196 1800 158 54 0.84 10.3 0.142 1600 214 65 2.46 11.91 0.604 750 99 56 0.8 9.3 0.037 560 194 43 1.26 10.3 0.065 4800 50 73 1.2 8 0.232 2000 11 68 1.2 8 0.020

Source: USEPA, 1991. Notes: HP = horsepower, Conversion factor 1 pound = 453.592 grams; 1 ton = 2000 pounds.

Transportation Options

Tables 3 and 4 provide the assumptions and results for air emissions for two options for truck deliveries for the project. Option 1 would require trucks to enter at Checkpoint 9, where depending on the level of traffic, trucks may idle for some time before undergoing inspection. Option 2 would create a temporary, dedicated and fenced haul road from Fort Dix Road to the Walson Complex. It is assumed that the overall distance and related air emissions of truck travel to and from the Walson Complex under both truck route options would be essentially the same. The difference in the options would be that there would be potential for trucks to wait and idle at Checkpoint 9 under Option 1 (during peak hours) and up to an additional 1523 truck trips under Option 2 to delivery and remove materials needed for the temporary truck route.

Table 3. Emissions under Option 1 (Truck Idling at Checkpoint 9)

Vehicle type	Vehicle Minutes (# trucks @40 minutes average)	NOx Emission Factor (g/min) at Idle	Tons of NOx annually	VOC Emission Factor (g/min) at Idle	Tons of VOCs annually
Heavy Diesel Trucks	236,920	3.731	0.974	0.397	0.104

Note: Idle emissions are based on 1/3 the USEPA emission factors (assumed to occur at 50 mph). Source: USEPA, 1991. Notes: HP = horsepower, Conversion factor 1 pound = 453.592 grams; 1 ton = 2000 pounds.

Table 4. Emissions under Option 2
(Additional Truck Deliveries for Access Road Construction)

Vehicle type	Vehicle Miles(1532 trucks @ 70 mi/RT)	NOx Emission Factor (g/mi)	Tons of NOx annually	VOC Emission Factor (g/mi)	Tons of VOCs annually
Heavy Diesel Trucks	107,240	13.43	1.588	1.43	0.169

Source: USEPA, 1991. Notes: HP = horsepower, Conversion factor 1 pound = 453.592 grams; 1 ton = 2000 pounds.

Option 2 would result in higher emissions than Option 1. For purposes of this analysis, the higher option will be used to determine whether the Proposed Action would be regionally significant.

Emissions Summary

Table 5 provides a summary of construction emissions estimated for Alternative 1.

Table 5. Summary of Construction Emissions – Alternative 1

Source	Tons of NOx	Tons of VOCs
Road Vehicles	6.563	1.152
Construction Diesel Equipment	8.714	1.295
Total in Tons	15.277	2.447
Total under Option 1	16.251	2.551
Total under Option 2	16.865	2.616

4. Results and Conclusions

Since the General Conformity Rule requires analysis only for emissions of criteria pollutants and their precursors for which an area is designated a "non-attainment" or maintenance area, emissions

were calculated only for the precursors of ozone, VOCs and NOx, as part of this RONA documentation.

This analysis revealed Alternative 1 (under the highest emission truck haul route option) would emit 16.865 tons of NOx and 2.616 tons of VOCs during the project, assumed to occur in one calendar year. The emission increases from the Proposed Action are below the de minimis threshold established at 40 CFR 51.853(b) of 50 tpy VOCs and 100 tpy NOx, and the Proposed Action is not considered "regionally significant" under 40 CFR 51.853(i). Therefore, this RONA satisfies the General Conformity Rule. As such, this RONA documents JB MDL's decision not to prepare a written conformity determination for the Proposed Action.

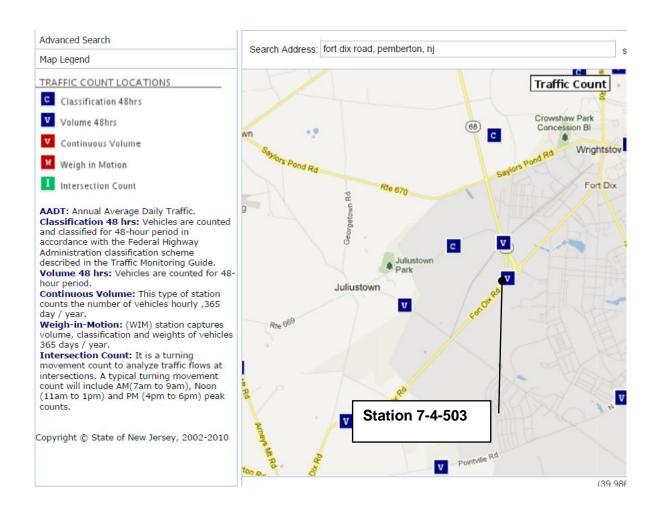
5. References

United States Environmental Protection Agency (USEPA). 1991. EPA 460/3-91-02. "Nonroad Engine and Vehicle Emission Study – Report". November 1991.

United States Environmental Protection Agency (USEPA). 2005. "*Emission Facts. Average Annual Emissions and Fuel Consumption for Gasoline-Fueled Passenger Cars and Light Trucks*". EPA420-F-05-022. Office of Transportation and Air Quality. August 2005.

APPENDIX C

Traffic Count Data



NEW JERSEY DEPARTMENT OF TRANSPORTATION DIVISION OF TRAFFIC ENGINEERING AND SAFETY Bureau of Transportation Data Development

Station ID: 7-4-503

SRI: 03000616__ Street Name: PEMBERTON-WRIGHTSTOW County: Burlington Location: BET NEW LISBON & BROWN MILLS Municipality: New Hanover

RDS Twp

Date: 1/28/2008 Direction: East/West By: amercom

Latitude: 40.015286

Longitude : -74.637077

Date	1/28/	2008	1/29/	2008	1/30/	2008	1/31,	/2008	2/1/	2008	32/2/	2008	2/3/	2008		Wee	kday
Day	mor	nday	tues	sday	wedn	esday	thur	sday	fric	day	satu	rday	sur	nday	HOUR	Ave	rage
direction	e	W	е	W	е	W	е	W	е	W	е	w	е	w		е	W
OAM - 1AM 1 - 2 2 - 3 3 - 4 4 - 5 5 - 6 6 - 7 7 - 8 8 - 9 9 - 10 10 - 11 11 - 12 12 N - 1PM 1 - 2 2 - 3 3 - 4 4 - 5 5 - 6 6 - 7 7 - 8 8 - 9 9 - 10 10 - 11	- - - - - 158 149 194 157 133	- - - - - 169 162 219 373	6 9 0 10 26 98 292 501 356 172 144 132 154 126 204 161 160	24 7 8 3 6 21 63 125 158 130 131 165 162 164 246 351 497	16 8 4 15 30 124 360 520 381	33 8 5 3 5 17 64 121 185 127 135 184	e	W	e	W	e	W	e	W	0AM - 1AM 1 - 2 2 - 3 3 - 4 4 - 5 5 - 6 6 - 7 7 - 8 8 - 9 9 - 10 10 - 11 11 - 12 12 N - 1PM 1 - 2 2 - 3 3 - 4 4 - 5 5 - 6 6 - 7 7 - 8 8 - 9 9 - 10 10 - 11 11 - 12 2 - 3 3 - 4 4 - 5 5 - 6 6 - 7 7 - 8 8 - 9 9 - 10 10 - 11 11 - 12 2 - 3 3 - 4 4 - 5 5 - 6 6 - 7 7 - 8 8 - 9 9 - 10 10 - 11 11 - 12 2 - 3 3 - 4 4 - 5 5 - 6 6 - 7 7 - 8 8 - 9 9 - 10 10 - 11 11 - 12 2 - 3 3 - 4 4 - 5 5 - 6 6 - 7 7 - 8 8 - 9 9 - 10 10 - 10 - 11 10 - 12 2 - 3 3 - 4 4 - 5 5 - 6 6 - 7 7 - 8 8 - 9 9 - 10 10 - 10 - 10 - 10 - 10 - 10 - 10 -	11 8 2 12 28 111 326 510 368 194 154 149 156 138 199 146 144 102 81 63 44 42 31	28 8 6 3 6 19 64 123 174 166 163 232 362 516 434 201 144 119 89 55 44
11 - 12	23	37	37	32											11 11 - 12	31	44
															24 hours	3178	338
															Pattern Factor	0.99	0.9
															Axle Cor. Fact	0.978	0.97

Table C-1. Summarized Gate Traffic Counts, Checkpoint 9

Time	Checkpoint 9	Checkpoint 9				
Time	IN	OUT				
12:00 AM	17	22				
1:00 AM	10	12				
2:00 AM	11	8				
3:00 AM	11	4				
4:00 AM	23	8				
5:00 AM	121	42				
6:00 AM	449	91				
7:00 AM	471	159				
8:00 AM	247	173				
9:00 AM	192	130				
10:00 AM	194	144				
11:00 AM	158	147				
12:00 Noon	223	211				
1:00 PM	168	223				
2:00 PM	155	265				
3:00 PM	145	386				
4:00 PM	136	480				
5:00 PM	47	438				
6:00 PM	11	256				
7:00 PM	65	133				
8:00 PM	149	13				
9:00 PM	115	0				
10:00 PM	103	0				
11:00 PM	67	0				
Total	3288	3345				

Note: Weekday traffic count, November 2010. Source: Joint Base Regional Transportation Mobility Study, August 15, 2011.

APPENDIX D

Newspaper Public Notice Affidavits

Final EA for	Demolition	of the	Walson	Hospital	Complex

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Affidavi	it of Publication
State of New Jersey) SS. MONMOUTH/OCEAN COUNTIES	
Personally appeared by Marissa DellaPietro	
County and State, and of general circulation in s	d in Freehold, NJ and published in NEPTUNE, in said said county, who being duly sworn, deposeth and saith a true copy, has been published in the said newspaper issue, as follows
	2012
JENNIFER L. FAGAN NOTARY PUBLIC OF NEW JERSEY MY COMMISSION EXPIRES APRIL 14,2013 Notary Public of New Jersey	Sworn and subscribed before me this 11th day of May 2012

Notice of Availability Draft EA and Draft FONSI for Proposed Demolition of the Walson Hospital Complex at Joint Base McGuire-Dix-Lakehurst, New Jersey

The JB MDL announces the availability of and invites public comments on the Draft Environmental Assessment (EA) and Draft Finding of No Significant Impact (FONSI) for the proposed demolition of the Walson Hospital Complex on Dix. Under the Proposed Action, the main hospital building, the air conditioning plant, and heat plant would be demolished. Parking lots, curbing, and walkways would also be removed. The Draft EA was prepared in accordance with the National Environmental Policy Act. Copies are available for review at the Ocean County Library, 21 Colonial Drive, Manchester, NJ 08759 and the Pemberton Library, 16 Broadway, Browns Mills, NJ 08015. Written comments should be submitted by June 12, 2012 to Mr. Dennis Blazak, 87 CES/CEA, JB MDL, Hwy 547, Bldg 5, Lakehurst, NJ 08733.

AP-8000547124

	Affidavit of Pub	lication	
of the Gannett, a newspaper printe County and State, and of general cir			
May 11, 2012	Asbury Park Press		
× 40.	N.C.1	Swom and subscribed before me this 17 day of	A.D., 2012 May A.D., 2012
Notary Public of New Jersey	CHOMON .		

Kathleen A. Gibson Notary Public State of New Jersey My Commission Expires Dec. 18, 2014

Notice of Availability Draft EA and Draft FONSI for Proposed Demolition of the Walson Hospital Complex at Joint Base McGuire-Dix-Lakehurst, New Jersey

McGuire-Dix-Lakehurst, New Jersey
The JB MDL announces the availability of and invites public comments on the Draft Environmental Assessment (EA) and Draft Finding of No Significant Impact (FONSI) for the proposed demolition of the Walson Hospital Complex on Dix. Under the Proposed Action, the main hospital building, the air conditioning plant, and heat plant would be demolished. Parking lots, curbing, and walkways would also be removed. The Draft EA was prepared in accordance with the National Environmental Policy Act. Copies are available for review at the Ocean County Library, 21 Colonial Drive, Manchester, N1 08759 and the Pemberton Library, 16 Broadway, Browns Mills, N1 08015. Written comments should be submitted by June 12, 2012 to Mr. Dennis Blazak, 87 CES/CEA, JB MDL, Hwy S47, Bldg 5, Lakehurst, NJ 08733.

APPENDIX E

Public Comments and Responses on the Draft EA

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State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
OFFICE OF PERMIT COORDINATION AND ENVIRONMENTAL REVIEW
P.O. Box 420 Mail Code 401-07J Trenton, New Jersey 08625-0420
Phone Number (609) 292-3600
FAX NUMBER (609) 292-1921

CHRIS CHRISTIE

BOB MARTIN Commissioner

KIM GUADAGNO Lt. Governor

June 6, 2012

Mr. Dennis Blazek 87th Civil Engineering Squadron Highway 547/Building 5 Lakehurst, NJ 08733

RE: Demolition of the Walson Hospital Complex at Joint Base McGuire-Dix-Lakehurst, New Jersey

Comments on the Environmental Assessment

Dear Mr. Blazek:

The New Jersey Department of Environmental Protection's (Department) Office of Permit Coordination and Environmental Review (PCER) distributed, for review and comment, the Environmental Assessment for the proposed demolition of the Walson Hospital Complex at Joint Base McGuire Dix Lakehurst. On behalf of the Department, we offer the following comments for your consideration regarding cultural resources.

The Department's Historic Preservation Office (HPO) provided comments directly to the Department of the Air Force in an email dated May 15, 2012. The email noted that the HPO has previously reviewed this proposed undertaking pursuant to Section 106 of the National Historic Preservation Act. That review included the demolition of the Walson Hospital Complex (Buildings 5250, 5251, and 5252) as well as three other buildings on the installation (Buildings 1911, 2101, and 2304). The Section 106 consultation process resulted in a finding of No Historic Properties Affected. A copy of their May 8, 2012 review letter (HPO-E2012-106) is attached for your reference. This finding is accurately reflected on page 4-5 of the draft EA document.

If additional consultation is required for this undertaking, please reference the HPO project # 12-0782 in any future calls, emails, or written correspondence in order to expedite our review and response.

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Thank you for giving the New Jersey Department of Environmental Protection the opportunity to comment on the EA for the proposed demolition of the Walson Hospital Complex.

Sincerely,

Scott Brubaker, Director Office of Permit Coordination and Environmental Review

Scott Brubaker/dm

Attachment

C: Jonathan Kinney, NJDEP - HPO Ken Koschek, NJDEP - PCER Donna Mahon, NJDEP - PCER Shelley Coltrain, NJDEP - Natural & Historic Resources

letter. This letter has been added to Appendix A in the Final EA.

Response: Thank you for your comments and providing a copy of the HPO's May 8, 2012



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2 290 BROADWAY NEW YORK, NY 10007-1866

JUN 1 1 2012

Dennis Blazak 87th Civil Engineering Squadron Highway 547/Building 5 Lakehurst, NJ 08733

Subject:

Draft Environmental Assessment for the Demolition of the Walson Hospital

Complex at Joint Base McGuire-Dix-Lakehurst, New Jersey

Dear Mr. Blazak:

The Environmental Protection Agency (EPA), Region 2 office has reviewed the Draft Environmental Assessment (DEA) for the Demolition of the Walson Hospital Complex at Joint Base McGuire-Dix-Lakehurst (JB MDL), New Jersey. The purpose of the project is to demolish the Walson Hospital Complex in order to reduce the infrastructure utility and maintenance costs at JB MDL. The demolition would also help the Air Force meet their strategic goal to reduce facilities and infrastructure costs by 20 percent by the year 2020.

In the Environmental Consequences section of the DEA, under 4.2.1.2 Effects of Option 2 Truck Route, it is stated that the new temporary truck route would "create a route through a grassy field between two housing areas. The path between the housing areas would introduce high noise levels from trucks during daytime hours that would likely be an annoyance to residents. The truck route would be next to a baseball field and through an open field where children are likely to play. It would also be within 50 feet of community gardeners from the Community Plaza residences. While the truck route would be fenced, preventing accidents, it would disrupt some recreational and gardening activities in the area for a period of up to 18 months." These impacts, coupled with the need for grading and paving discussed in section 4.4.1.2, as well as tree removal discussed in section 4.6.1.2 do not make it an obvious preferred alternative when compared to Option 1 of utilizing the existing roads. There would be a 1.8% decrease in traffic compared to Option 1, however the negative impacts seem to outweigh the benefits. EPA recommends enhancing the discussion of why Option 2 is the preferred option.

Section 4.6.1 mentions that the NJDEP Division of Fish and Wildlife was contacted in regard to this project and that a 3-hour intensive inspection of the building revealed that there were no bats present. EPA recommends that the Air Force also coordinate with the US Fish and Wildlife Service to ensure that there are no bats or other threatened or endangered species present in nearby habitats. The blasts associated with the demolition of the Walson Hospital Complex could potentially result in a "take" of bats or other threatened or endangered species under the Endangered Species Act even if there are no species located within the structure.

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Leace Husumer

Thank you for the opportunity to comment. Should you have any questions concerning this letter please feel free to contact Stephanie Lamster of my staff at 212-637-3465.

Sincerely,

Grace Musumeci, Chief

Environmental Review Section

cc: Jeremy Markuson, FWS

Response: Thank you for your comments. Truck route Option1 was preferred for economic reasons and ease of contractor operations as compared to solely environmental reasons. The minor adverse impacts regarding noise near the residential area would be temporary and occur only during daytime weekday hours. Our base housing director provided a fact sheet to residents to solicit their concerns on this proposal. No comments were received.

JB MDL provide opportunity to the US FWS to provide input on the project prior to the initiation of the EA and during the public comment period. There are no known threatened and endangered species in the area that would be affected by the proposed action.